

Corporate identity

OUR PURPOSE

Passionate about creating a unique, **excellent**, innovative break. Any time of day, anywhere in the world.



OUR VISION

We **aim** to bring to consumers in Europe, the **Italian excellence** in coffee and vending, enriching every moment of their day.



OUR VALUES

Excellence
Collaboration & listening
Spirit of initiative & speed
Responsibility





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SUSTAINABILITY REPORTING

GENERAL INFORMATION

ESRS 2 GENERAL DISCLOSURES

Basis for preparation

BP-1 - General basis of preparation

Sustainability Reporting has been prepared on a consolidated basis, with the reporting scope coinciding with that of the Financial Statements. Consistent with that indicated in the financial reporting, the data and information - both qualitative and quantitative - contained in this document refer to the fiscal year ending 31st December 2024. [\[BP-1-5.a-b\]](#)

The Sustainability Statement includes the upstream, direct and downstream stages of the Group's value chain. For each datapoint reported, the relevance of the issue in relation to Group operations or the entire value chain was indicated.

In particular, upstream activities included:

- Production and manufacturing activities pertaining to the production of vending machines and food products that the company supplies;
- The logistical activities of transporting food products and vending machines from suppliers.

The direct activities considered are those of storing, preserving and transporting food products, as well as handling coins and delivering vending machines to offices and other places of business. This also includes the installation, maintenance and management of installed vending machines, the management, counting and packaging of physical coins (Coin Service), as well as the management of electronic payments and sales support via call centres. The downstream activities included in the declaration are the use and end-of-life of non-IVS products and the disposal of vending machines at their end-of-life.

With respect to the value chain, it should be noted that the materiality analysis, together with the assessment of impacts, risks and opportunities, takes into account the entire process described in the previous steps. The policies, actions, targets and metrics currently set out then refer exclusively to the Group's own operations. The undertaking has not used the option to omit a specific piece of information corresponding to intellectual property, know-how or the results of innovation. [\[BP-1-5.c-d\]](#)

In addition, the Group did not benefit from exemptions relating to the non-disclosure of upcoming developments or matters under negotiation, as provided for in Articles 19a(3) and 29a(3) of Directive 2013/34/EU. [\[BP-1-5.e\]](#)

BP-2 - Disclosures in relation to specific circumstances

For the preparation of Sustainability Reporting, the time horizons adopted are defined as: short-term covering a period of no more than one year, medium-term covering a period of 1 to 5 years and long-term covering periods of more than 5 years. [\[BP-2-9.a\]](#)

Value chain estimates

With respect to value chain metrics, it is specified that the following data was estimated using indirect sources:

Scope 3 category (according to GHG Protocol classification)	Basis of preparation and level of accuracy	Emission factor used
1 (purchased goods and services)	Emissions related to purchased goods and services are estimated on the basis of the relevant economic values of expenditure	DEFRA, UK Government GHG conversion factors for company reporting
2 (capital goods)	Emissions related to purchased goods and services are estimated on the basis of the relevant economic values of expenditure	
3 (fuel- and energy-related activities)	Emissions related to energy consumed (excluding those included in Scope 2) are estimated on the basis of the Group's energy consumption	
4 (upstream transportation and distribution)	Emissions from upstream transport are estimated on the basis of kilometres travelled and weight of goods transported	
5 (waste generated in operations)	Emissions related to the disposal and treatment of waste generated are estimated on the basis of the waste produced in the year by the Group	
6 (business travel)	Emissions related to business trips of Group employees are estimated on the basis of the economic value spent	
7 (employee commuting)	Emissions related to the home-work journeys of Group employees are estimated on the basis of the results of a questionnaire prepared by the Group	
8 (upstream leased assets)	Included in Scope 1 and 2 emissions	
9 (downstream transportation and distribution)	Downstream transport-related emissions are estimated on the basis of the kilometres travelled and the weight of the goods transported	
10 (processing of sold products)	Not applicable	
11 (use of sold products)	Emissions related to the use of the product sold are estimated on the basis of the units sold in the year by the Group	
12 (end-of-life treatment of sold products)	Emissions related to end-of-life processing or disposal of the product sold are estimated on the basis of the units sold or loaded in the year by the Group	
13 (downstream leased assets)	Not applicable	
14 (franchises)	Not applicable	
15 (investments)	Not applicable	

The calculation methodologies for Scope 3 greenhouse gas emissions are subject to greater intrinsic limitations than those for Scope 1 and 2, due to the limited availability and relative precision of the information used to define such information, both quantitative and qualitative, relating to the value chain. [\[BP-2-10.a-b-c-d\]](#)

Causes of uncertainty in estimates and results

With respect to the quantitative metrics set out in the document that are subject to a high degree of measurement uncertainty, it is specified that there are no metrics or monetary amounts within the document that are subject to a high degree of uncertainty, except for Scope 3 indirect GHG emissions, which are estimated based on the assumptions listed in section Value chain estimates [\[BP 2-10\]](#).

All forward-looking disclosures are the result of reasonable assumptions by the Group's management but, given their nature, are intrinsically characterized by elements of uncertainty. [\[BP-2-11.a\]](#)

Changes in the drafting and presentation of sustainability information

No comparative data is shown for this first fiscal year of Sustainability Reporting. [\[BP-2-13\]](#)

Reporting errors in previous periods

No comparative data is shown for this first fiscal year of Sustainability Reporting. [\[BP-2-14\]](#)

Disclosures required by other legislation or generally-accepted Sustainability Reporting requirements

The information contained in this Report not only fulfils the ESRS requirements but also includes data compiled in accordance with the guidelines prescribed by the Greenhouse Gas Protocol (hereinafter, also "GHG Protocol") for measuring Greenhouse Gas (hereinafter, also "GHG") emissions of organisations. [\[BP-2-15\]](#)

Governance

GOV-1 - The role of the administrative, management and supervisory bodies

As of 2024, the Board of Directors consists of a total of 7 members, 4 of whom are executive and 3 non-executive. Furthermore, the Board does not include representation of employees and other workers, in accordance with current legislation and corporate inclusion and participation practices. [\[GOV-1-21.a-b\]](#)

The Board is comprised of members with diverse professional backgrounds and significant expertise in the sectors, products and geographical locations in which the company operates. These experiences form the basis for the effective management of impacts, risks and opportunities, as well as for the continuous improvement of the Board's competencies.

[\[GOV-1-21.c, AR.5\]](#)

From the point of view of diversity:

- The Board of Directors is composed of 0% women and 100% men;
- The Audit Committee consists of 33.3% women and 66.7% men;
- The Supervisory Body on Law 231/2001 is composed of 33.3% women and 66.7% men.

Gender diversity is calculated as the average ratio of female to male members.

In terms of independence:

- The company has ensured that 100% of the non-executive members of the Board are independent;
- The company has ensured that 100% of the members of the Audit Committee are independent;
- The company has ensured that 66.7% of the members of the Supervisory Body on Law 231/2001 are independent. [\[GOV-1-21.d-e\]](#)

The Board of Directors annually reviews the mapping of sustainability-related impacts, risks and opportunities. Responsibility for managing any impact has been delegated by the Board to the Quality, HACCP, Safety and Environment Department, which is also in charge of overseeing the Integrated Risk Management System. This function prepares the annual Management Review in order to ensure continuous and systematic oversight of sustainability impacts, risks and opportunities related to the Group's activities. [\[GOV-1-22.a\]](#)

Administrative, management and supervisory bodies have defined roles and responsibilities, reflected in the terms of reference, Board mandates and relative company policies. The Board of Directors is responsible for the general management, determining the risk profile and significant strategic, economic and financial transactions. The Managing Director oversees the Internal Control System and Risk Management with the support of the Audit Committee. The Audit Committee participates in significant transactions, ensuring a complete and timely flow of information. The Chair of the Board of Directors facilitates dialogue between executive and non-executive directors, oversees the accuracy of information and coordinates the activities of committees. In addition, the company has established an Integrated Risk Management System covering quality, safety, environmental and social responsibility standards, ensuring effective internal control and coordinated risk management. [\[GOV-1-22.b\]](#)

The Quality Standards, HACCP, Environment and Safety function is responsible for the Integrated Internal Control and Risk Management System. Supervision is ensured through internal and external audits, planned annually and involving all Group companies and subsidiaries. The Managing Director oversees the Internal Control and Risk Management System, periodically reporting to the Board of Directors. The Audit Committee monitors the processing of financial and non-financial information and reports to the Board on the effectiveness of the internal control system. Dedicated controls and procedures, including audits and annual planning, are integrated with other internal functions to ensure continuous monitoring and constant improvement of the Management System. [\[GOV-1-22.c\]](#)

The Board of Directors oversees the setting of targets relating to material impacts, risks and opportunities through the review and approval of the strategic, industrial and financial plan, whilst periodically monitoring the results achieved against the set targets. The Chief Executive Officers (CEOs) are responsible for overseeing the Internal Control System and Risk Management, implementing the guidelines set by the Board of Directors. The Audit Committee assists the Board in defining the guidelines of the internal control system, ensuring that the main risks are correctly identified, assessed, managed and monitored. The Internal Audit function verifies the operation and suitability of the Internal Control and Risk Management System through an audit plan approved by the Board of Directors. [\[GOV-1-22.d\]](#)

The administrative, management and supervisory bodies and senior management that oversee the definition of objectives relating to relevant impacts, risks and opportunities have specific expertise in sustainability, which was expanded during the year through specific training activities and discussions, including with external advisors on issues relating to Double Materiality Analysis. [\[GOV-1-23.a\]](#)

These competencies are instrumental in the conscious management of sustainability-related impacts, risks and opportunities relevant to the company.

[\[GOV-1-23.b, GOV-1-AR.5\]](#)

GOV-2 - Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies

The Board of Directors is informed by the Sustainability Team of the results of the double materiality analysis exercise, which was carried out for the first time in 2024 and is viewed annually. [\[GOV-2-26.a-b\]](#)

The impacts, risks and opportunities reviewed by the Board of Directors, management and supervisory bodies in 2024 are those found to be material from the Double Materiality Analysis reported in SBM-3.

[\[GOV-2-26.c\]](#)

GOV-3 - Integration of sustainability-related performance in incentive schemes

Performance-related remuneration schemes are based on measurable objectives and evaluation criteria, with the intention of consistently aligning the remuneration of executive directors and top managers with the medium- to long-term interests of shareholders and the objectives set by the Company's Board of Directors. These consist in a component linked to short-term variable remuneration and a component linked to long-term variable remuneration.

Short-term variable remuneration (Management By Objective or MBO programme) is paid according to the degree of achievement of annual targets pertaining to the scope of responsibilities agreed annually with the beneficiary and has a variable amount between 10-15% of the gross annual remuneration.

Long-term variable remuneration, governed by the Incentive Plan, is aimed at the Group's Managing Directors and strategic personnel, designed to align management interests with the creation of shareholder value in the medium- to long-term, to focus the attention of beneficiaries on factors of strategic interest and to increase the commitment of key resources. The achievement of these objectives entails the free

allocation of non-transferable options, each of which gives the beneficiaries the right to purchase a share of the Company. [\[GOV-3-29.a\]](#)

Under the current incentive system, performance is not evaluated according to sustainability parameters.

[\[GOV-3-29.b-c-d-e\]](#)

GOV-4 - Statement on due diligence

IVS does not currently have a structured due-diligence process regarding sustainability issues. However, the Group has already enacted several key elements regarding duty of care, including first and foremost the identification and assessment of negated impacts as per the Double Materiality Analysis. [\[GOV-4-30,32\]](#)

GOV-5 - Risk management and internal controls over Sustainability Reporting

The Group has established an internal control system to ensure the reliability of the quantitative information contained in the Sustainability Report, with a clear definition of roles and responsibilities along the entire chain of data generation, processing and consolidation. Although the system is not formalised in a specific procedure, it is implemented by the various figures involved, both at the level of the central sustainability function and at the level of individual companies. The control includes a check on the consistency of the data with the trend history and the expected values of the KPIs, with the frequency of checks varying according to the KPI itself. The controls focus mainly on KPIs that are considered more complex and, consequently, more exposed to a risk of error during processing or consolidation. [\[GOV-5-36.a-b\]](#) For each KPI, specific mitigation strategies are implemented, including a thorough verification of the calculation performed by the data owner. [\[GOV-5-36.c\]](#) The selection of KPIs to be monitored is guided by an assessment of the risk of error, being the main criterion for defining which indicators are included in the internal control system. However, there is currently no provision for periodic reporting on the results of risk assessments and checks carried out. [\[GOV-5-36.d\]](#)

Strategy

SBM-1 - Strategy, business model and value chain

The IVS Group is the market leader in the Italian Vending machines operators' sector, specialized in the sale of hot and cold beverages and snacks, through automatic and semi-automatic vending machines. The solutions offered by the Group include:

- Medium and large vending machines by product category (hot or mixed);
- Small automatic and semi-automatic vending machines (OCS - Office Coffee Service).

The Luxembourg-based IVS Group operates through four business segments:

- The Vending Division (with branches in Italy, France, Spain and other European countries);
- The Ho.Re.Ca Division;
- The Reselling Division;
- The Coin Division

With regard to total revenue, please refer to the section Revenue Segment Reporting IFRS 8. [\[SBM-1-40.b\]](#)

The number of employees is detailed below, broken down by the various geographical areas in which the Group operates: [\[SBM-1-40.a\]](#)

Country	No. of employees (headcount)
Italy	3,479
Spain	568
France	346
Germany	101
Poland	60
Switzerland	19
United Kingdom	14
Portugal	9
San Marino	8
Hong Kong	1

The Group conducted an assessment of its main products and/or services, as well as the most relevant markets and customer groups, in relation to the sustainability goals.

The Group's sustainability targets - in terms of products and services, customer categories, geographic areas and different stakeholder categories - are as follows:

- **High-efficiency Energy Saving Distributors**
On the IVS Group's vending machines, systems are being installed that allow for activation only when actually used, thus optimising energy consumption. This solution not only improves operational efficiency but also helps to reduce waste and save energy.
- **Low-emission company fleet with natural gas and electric vehicles**
In an ongoing commitment to sustainability, the Group has enriched its corporate fleet with the latest generation of vehicles, designed to ensure minimal environmental impact. In addition to conventional vehicles, natural gas and electric vehicles were introduced, further reducing emissions and promoting a more sustainable mobility.
- **Photovoltaic energy panels for Group companies**
To generate clean, renewable energy, photovoltaic panels were installed on the roofs of certain warehouses. This system means the Group's sites can produce their own solar energy, significantly reducing CO₂ emissions and contributing to the transition to a more sustainable energy model.
- **Certified suppliers for a sustainable supply chain**
In line with its vision of integrated sustainability, the Group selects its business partners and suppliers with a particular focus on those with environmental certifications. Working with certified suppliers ensures that the entire value chain meets high standards of social and environmental responsibility, contributing to a positive impact on the entire supply chain. [\[SBM-1-40.e-f-g\]](#)

For a description of the value chain, please refer to Disclosure BP-1-5.c, whilst for a description of the business model, please refer to Disclosure SBM-1-40, along with that which follows.

[\[SBM-1-42.a, SBM-1-AR.14\]](#)

Data protection is guaranteed by means of advanced security measures, in accordance with current regulations.

The Group has developed a business model geared towards the creation of direct and induced economic value for its customers, investors and other stakeholders, with a strong commitment to sustainability and the well-being of the community in which it operates. Its activities, with a focus on operational efficiency, the growth of human resources and optimisation of consumption, play a crucial role in sustaining long-term growth and competitiveness. The main results and benefits expected from the Group are outlined below, highlighting the positive impacts they generate in economic, social and environmental terms.

Generation and distribution of direct and induced economic value:

By adopting practices that favour free competition, employment and the development of personnel skills, the Group actively contributes to the development and wellbeing of its internal stakeholders and, by extension, of the local community to which they belong. In addition, the Group contributes to the taxation system, being indispensable for the development and growth of the environment in which it operates. Finally, through an economically-inclusive welfare programme, IVS contributes to the generation of economic value for the benefit of the community.

Employee skill development:

The development of employees' competencies is crucial for the creation of a virtuous and safe working environment. The Group pays special attention to the issues of staff training and skill enhancement.

Induced efficiency gains in raw material and packaging consumption and logistics:

The Group's customer services generate savings for the end consumer in terms of the consumption of raw materials and packaging, allowing for consumption and purchasing directly from their place of work, instead of going to external outlets. [\[SBM-1-42.b\]](#)

The Group's value chain is divided into upstream, direct and downstream activities, with upstream activities including production and manufacturing processes related to the manufacture of vending machines, the cultivation and production of the foodstuffs needed to supply the company as well as the purchase and transport of foodstuffs and vending machines from suppliers.

The Group's direct activities mainly concern the storage and preservation of food products, the transport of food, coins and vending machines to the operating sites, the installation, maintenance and operation of vending machines, the management, counting and packaging of physical coins (Coin Service), as well as the

management of electronic payments and sales support via the call centres.

Finally, the Group's downstream activities focus on the use and end-of-life of products not directly managed by IVS, mainly the packaging of food products sold, as well as the disposal of vending machines at the end of their life. [\[SBM-1-42.c\]](#)

SBM-2 - Interests and views of stakeholders

Relevant stakeholders for the Group were identified through a mapping exercise based on an in-depth analysis of current legislation and industry benchmarks. The main stakeholders identified are employees, contractors, the media, local communities, suppliers, partners, institutions, shareholders, financiers, consumers and customers. Stakeholder involvement is governed by specific regulations that are approved by the Board of Directors and which define the general principles and procedures for dialogue. This regulation ensures transparency, timeliness, equal treatment and compliance with legal regulations and internal governance rules.

The Group integrates the results of stakeholder engagement (mainly: consumers, customers, employees, collaborators and media, local communities, suppliers and partners, institutions, shareholders and lenders) in the development of policies and strategic plans to ensure better alignment with the expectations and needs of all stakeholders. [\[SBM-2-45.a\]](#)

Through stakeholder engagement activities, the Group is able to identify the interests, expectations and needs of various stakeholders. To facilitate this process, specific communication channels were activated, including internal employee surveys and polls, together with the creation of strategic partnerships with suppliers and business partners. In addition, this information was analysed during the Due Diligence and Materiality Assessment processes to ensure that the Group's strategy effectively responds to stakeholder expectations and helps guide strategic priorities.

[\[SBM-2-45.b\]](#)

To date, the Group has no mechanism in place for communicating to the Board of Directors regarding possible views and stakeholder interests regarding the company's sustainability-related impacts. [\[SBM-2-45.d\]](#)

SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model

The IVS Group faces a number of risks and opportunities that can directly affect its core business.

List of material impacts	Positive/negative	Description [SBM-3-48.c]	Direct/Indirect	Time horizon
Contribution of the company's suppliers to climate change	Negative	The consumption of energy from non-renewable sources by suppliers (for transport activities in particular), inefficiencies in the management of energy consumption and food production activities result in emissions of climate-changing gases that contribute to the phenomenon of climate change.	Indirect	Long-term
Contribution of company operations to climate change	Negative	The consumption of energy from non-renewable sources related to the company's activities (for transport activities in particular), inefficiencies in the management of energy consumption and the use of refrigerant gases for vending machines cause emissions of climate-changing gases that contribute to the phenomenon of climate change.	Direct	Long-term
Air pollution due to logistics	Negative	The transport of products to refill the vending machines and the travel of IVS employees to repair vending machines at the facilities where they are installed cause the emission of air pollutants related to the use of fossil-fuelled vehicles.	Direct	Medium-term
Contribution of suppliers to water scarcity	Negative	The activities of processed food companies, as IVS suppliers, contribute to the scarcity of the water resource as a raw material needed for their production and transformation processes (e.g., beverage and packaged food production). The impact is further amplified in water-stressed areas.	Indirect	Short-term
Contribution to raw material shortages due to suppliers' production activities	Negative	Raw material extraction and vending machine production upstream in the value chain involve primary material consumption related to electrical and electronic materials.	Indirect	Medium-term
Generation of non-recyclable waste from product packaging	Negative	Placing on the market products with non-recyclable or non-reusable packaging generates waste for disposal.	Indirect	Medium-term
Impact on the health and safety of workers and co-workers	Negative	The presence of elements of potential risk can lead to occupational accidents, especially related to transport and maintenance activities.	Direct	Short-term
Developing employees' skills	Positive	Positive impact linked to the contribution to the professional development and training of employees through the Group's training offer.	Direct	Medium-term
Violation of human or labour rights in the supply chain	Negative	Potential negative impact on workers involved along the supply chain - suppliers' work activities may be characterised by exposure to the risk of accidents and incidents of human or labour rights violations.	Indirect	Medium-term
Damage to consumer health	Negative	The company's activities can lead to possible damage to consumers' health if dietarily unhealthy or poorly-preserved food is distributed. In particular, such impact can also be caused by the use of non-compliant water for the dispensing of hot and cold beverages.	Indirect	Medium-term
Incidents of corruption and money laundering	Negative	Negative impact on individuals and the sector in general, generated by possible corruption and money laundering incidents.	Direct	Long-term
Distortions in the market by anti-competitive behaviour	Negative	Through its activities, the company could engage in anti-competitive and monopolistic behaviour or practices, leading to price barriers, barriers to the entry of other players into the market and contributing to reducing the stimulus for the development of new technologies and solutions to meet market needs.	Direct	Short-term

List of material risks/opportunities	Description	Direct/Indirect	Time horizon
Risk of disruption of operations due to extreme weather events (physical)	Operational risk resulting from the increased frequency of extreme weather events due to climate change, which may cause an increase in disruptions to the company's operations. In particular, some of the company's premises are close to watercourses, which are thus subject to possible flooding in the event of heavy rainfall. In addition, weather conditions could aggravate any cases of fire inside or outside the company.	Direct	Medium-term
Risk of supply disruptions due to extreme weather events (physical)	Operational risk due to the increased frequency of extreme weather events due to climate change, which may cause interruptions in the supply of products and materials needed for IVS operations.	Indirect	Medium-term
Risk of rising energy costs (transitional)	The absence or scarcity of energy efficiency and self-generation systems results in higher energy consumption, rendering the company more vulnerable to rising energy prices on the market.	Direct	Medium-term
Risk of increased packaging costs	Companies supplying food products could be affected by regulatory demands regarding the packaging of food products, forcing companies to adopt more expensive biodegradable and recyclable packaging, consequently causing an increase in the cost of purchasing such products for IVS.	Indirect	Medium-term
Risk of business interruptions as a consequence of occupational accidents	Possible interruptions of activities as a consequence of possible accidents to employees and contractors can have a negative impact on both the Group's reputation and revenues.	Direct	Long-term
Risk of legal sanctions for anti-competitive practices	Since part of IVS's strategy is to be the leader in the markets in which it operates, the Group is susceptible to accusations of abuse of position (particularly in Italy) or anti-competitive practices. Such complaints could adversely affect reputation and result in legal proceedings and fines that could have a negative impact on the business.	Direct	Medium-term
Risk of business continuity disruptions due to cybersecurity breaches	Potential breaches of customer cybersecurity in the area of electronic payments at ATMs pose a risk to the company's business continuity.	Direct	Medium-term
Risk from the introduction of driving restrictions for polluting vehicles	Operational risk related to the possible introduction of traffic restrictions on polluting vehicles, which may cause disruptions to the distribution of Group products throughout the territory	Direct	Medium-term
Reputational risks and legal sanctions in the event of consumer harm	In the event of damage to public health related to distributed food and beverages, the company may incur legal sanctions. Moreover, this would entail a reputational risk.	Indirect	Medium-term
Risk of legal and reputational sanctions for corruption and money laundering	Incidents of corruption and money laundering may pose a risk of legal sanctions for the company, along with a risk to its reputation.	Direct	Medium-term
Risk arising from measures restricting the circulation of thermal combustion vehicles (transitional)	Most of the vehicles utilised by the company are powered by fossil fuels, making IVS very vulnerable to changes to their price and availability.	Direct	Medium-term
Risk of raw material cost increases along the supply chain	The scarcity of raw materials can lead to an increase in the cost of such raw materials along the supply chain due to a reduction in supply compared to market demand.	Indirect	Medium-term
Opportunities to develop management skills and technical know-how	Economic opportunity linked to the development of human capital, the professional profiles and training of IVS employees that can lead to a general improvement in the work performed and thus in the overall economic performance of the company.	Direct	Medium-term
Risks related to changes in food safety legislation	The food and beverage industry is highly regulated, thus the activities of IVS and that of its key suppliers could be significantly affected by changes in legislation. In addition, non-compliance could result in fines or restrictions on activities.	Direct	Medium-term

It is specified that no financial effects have been identified or quantified with respect to the aforementioned risks at present. [\[SBM-3-48.a,b\]](#)

The Group considers risk management - which encompasses internal and external social, industrial, political and financial risks - to be a key element of its growth strategy and a key factor in ensuring the resilience of its business model. Such management not only protects stakeholders (employees, customers, suppliers, shareholders) and corporate assets but also supports the continuous evolution of the Corporate Governance System.

To ensure long-term sustainability, the Group adopts a dynamic and integrated approach to risk management, which includes a continuous analysis of material impacts, risks and opportunities. [\[SBM-3-48.f\]](#)

The Double Materiality Analysis revealed new material impacts compared to what was previously reported, such as:

- Contribution of company operations to climate change
- Violation of human or labour rights in the supply chain
- Generation of non-recyclable waste from product packaging
- Market distortions due to anti-competitive behaviour
- Incidents of corruption and money-laundering

On the other hand, some impacts were no longer material, such as:

- Waste of energy resources related to operations
- Procurement-related environmental impacts
- Generation of non-recyclable waste from operations and end-of-life products
- Damage to public health
- Dissemination of false or misleading consumer information
- Lack of employee skill development
- Accidents at work
- Incidents of discrimination

Because this was the first year of reporting under the ESRS, it was not possible to benchmark risks and opportunities. [\[SBM-3-3-48.g\]](#)

Impact, Risk and Opportunity Management

IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities

The process of identifying, assessing, prioritising and monitoring the Group's impacts builds on the criteria used to identify and assess non-financial impacts, risks and opportunities described in the European Sustainability Reporting Standards (ESRS). [\[IRO-1-53.a\]](#)

This process includes an assessment of impacts in terms of scale, scope, irreversibility, severity and likelihood, with a particular focus on the expected impact on people and the environment.

The process covers all of the Group's specific activities, examining in detail the Vending, Hospitality, Resale and Coin Divisions, as well as commercial relations, covering upstream and downstream activities and the various geographical areas where the Group is present.

Stakeholder needs and expectations are analysed using public sources, such as studies of industry trends, reports from associations and NGOs (e.g., CDC, SASB, etc.), legislative documents, media analyses and comparative benchmarks against a panel of peers, in order to ensure a comprehensive and up-to-date view of relevant stakeholder issues. [\[IRO-1-53.b\]](#)

The risk and opportunity mapping process includes the following activities:

- Mapping the impacts generated that may also constitute a risk or an opportunity;
- Mapping of dependencies along the supply chain that may pose a risk or opportunity related to sustainability issues. [\[IRO-1-53.c\]](#)

The Board of Directors is responsible for approving the Sustainability Report, reviewing and approving the Letter to Stakeholders and approving the results of the Materiality Analysis. Impact management is delegated to the Head of the Quality, HACCP, Safety and Environment function, who is also responsible for the Integrated Risk Management System. This function is in charge of drawing up the annual Management Review. The Group's due diligence process, along with other tools for identifying and managing impacts on the economy, environment and people, is reviewed annually by the Board of Directors. [\[IRO-1-53.d\]](#)

The process of identifying and assessing material impacts, risks and opportunities was carried out for the first time for reporting on the 2024 financial year in application of the European Sustainability Reporting Standards (ESRS). The results were shared with the Board of Directors. The analysis was also carried out taking into consideration the mapping identified within the Organisational Model and the Integrated Environmental System. [\[IRO-1-53.e-f\]](#)

For the identification, evaluation and prioritisation of impacts, an analysis of public sources was used, with the aim of identifying the main sustainability issues and trends in the sector, by consulting publications of associations and NGOs (e.g. CDC, SASB, etc.) and

legislative sources, the media and a benchmark analysis was carried out against a peer/comparable panel. Relevant internal documentation was likewise analysed, such as the 2023 Sustainability Report, the Code of Ethics and the 2023 Annual Report.

The identification, assessment and prioritisation of risks and opportunities was based on the analysis of the Impact Significance Analysis and relative mitigation actions, an analysis of the Group's dependencies and the analysis of relevant internal documentation, such as the Annual Report, the October 2019 Stock Exchange Trading Commencement Report, the insurance policies and the document related to the Risk Assessment within the management systems carried out in 2023.

[\[IRO-1-53.g\]](#)

2024 is the first year in which the Group conducted a Double Materiality Analysis, in accordance with European Sustainability Reporting Standards (ESRS). In the previous reporting period, the Materiality Analysis was conducted according to GRI standards, which do not include a specific identification of risks and opportunities. [\[IRO-1-53.h\]](#)



IRO-2 - Disclosure requirements in ESRS covered by the undertaking's sustainability statement

[IRO-2-56]

ESRS 2

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SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model	60
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E1.SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model	76
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Below is a table listing the datapoints contained in standards derived from other European regulations, in order to provide a complete overview of the information required in accordance with European Union laws.

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page	Materiality
ESRS 2 GOV-1 Board's gender diversity - Paragraph 21 (d)	Indicator 13 of Table #1 of Annex 1		Commission Delegated Regulation (EU) 2020/1816 (27), Annex II		56	Yes
ESRS 2 GOV-1 Percentage of board members who are independent - Paragraph 21 (e)			Delegated Regulation (EU) 2020/1816, Annex II		56	Yes
ESRS 2 GOV-4 Statement on due diligence - Paragraph 30	Indicator 10 of Table #3 of Annex 1				57	Yes
ESRS E1-1 Transition plan to reach climate neutrality by 2050 - Paragraph 14				Regulation (EU) 2021/1119, Article 2(1)	76	Yes
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks - Paragraph 16 (g)		Article 449a Regulation (EU) no. 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book- Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 12.1 (d) to (g) and Article 12.2		76	Yes
ESRS E1-4 GHG emission reduction targets - Paragraph 34	Indicator 4 of Table #2 of Annex 1	Article 449a Regulation (EU) no. 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book - Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 6		78	Yes
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) - Paragraph 38	Indicator 5 of Table #1 and Indicator 5 of Table #2 of Annex 1				78	Yes
ESRS E1-5 Energy consumption and mix - Paragraph 37	Indicator 5 of Table #1 of Annex 1				78	Yes
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors - Paragraphs 40 to 43	Indicator 6 of Table #1 of Annex 1				N/A	No
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions - Paragraph 44	Indicators 1 and 2 of Table #1 of Annex 1	Article 449a; Regulation (EU) no. 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book - Climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Articles 5(1), 6 and 8(1)		79	Yes

ESRS E1-6 Gross GHG emissions intensity - Paragraphs 53 to 55	Indicators 3 of Table #1 of Annex 1	Article 449a of Regulation (EU) no. 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book - Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 8(1)	79	Yes
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil - Paragraph 28	Indicator 8 of Table #1 of Annex 1 Indicator 2 of Table #2 of Annex 1 Indicator 1 of Table #2 of Annex 1 Indicator 3 of Table #2 of Annex 1			80	Yes
ESRS E3-1 Water and marine resources - Paragraph 9	Indicator 7 of Table #2 of Annex 1			N/A	No
ESRS E3-1 Dedicated policy - Paragraph 13	Indicator 8 of Table #2 of Annex 1			N/A	No
ESRS E3-4 Total water recycled and reused - Paragraph 28 (c)	Indicator 6.2 of Table #2 of Annex 1			81	Yes
ESRS E3-4 Total water consumption in m3 per net revenue on own operations - Paragraph 29	Indicator 6.1 of Table #2 of Annex 1			81	Yes
ESRS 2 - SBM 3 - E4 Paragraph 16 (a) i	Indicator 7 of Table #1 of Annex 1			N/A	No
ESRS 2 - SBM 3 - E4 Paragraph 16 (b)	Indicator 10 of Table #2 of Annex 1			N/A	No
ESRS 2 - SBM 3 - E4 Paragraph 16 (c)	Indicator 14 of Table #2 of Annex 1			N/A	No
ESRS E4-2 Sustainable land/ agriculture practices or policies - Paragraph 24 (b)	Indicator 11 of Table #2 of Annex 1			N/A	No
ESRS E4-2 Sustainable oceans/seas practices or policies - Paragraph 24 (c)	Indicator 12 of Table #2 of Annex 1			N/A	No
ESRS E4-2 Policies to address deforestation - Paragraph 24 (d)	Indicator 15 of Table #2 of Annex 1			N/A	No
ESRS E5-5 Non-recycled waste Paragraph 37 (d)	Indicator 13 of Table #2 of Annex 1			83	Yes
ESRS E5-5 Hazardous waste and radioactive waste paragraph 39	Indicator 9 of Table #1 of Annex 1			83	Yes
ESRS 2- SBM3 - S1 Risk of incidents of forced labour Paragraph 14 (f)	Indicator 13 of Table #3 of Annex I			84	Yes

ESRS 2 - SBM3 - S1 Risk of incidents of child labour - Paragraph 14 (g)	Indicator 12 of Table #3 of Annex I		84	Yes
ESRS S1-1 Human rights policy commitments - Paragraph 20	Indicator 9 of Table #3 and Indicator 11 of Table #1 of Annex I		85	Yes
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labour Organisation Conventions 1 to 8 - Paragraph 21		Delegated Regulation (EU) 2020/1816, Annex II	N/A	No
ESRS S1-1 Processes and measures for preventing trafficking in human beings - Paragraph 22	Indicator 11 of Table #3 of Annex I		N/A	No
ESRS S1-1 Workplace accident prevention policy or management system - Paragraph 23	Indicator 1 of Table #3 of Annex I		85	Yes
ESRS S1-3 Grievance/complaints on handling mechanisms - Paragraph 32 (c)	Indicator 5 of Table #3 of Annex I		86	Yes
ESRS S1-14 Number of fatalities and number and rate of work-related accidents - Paragraph 88 (b) and (c)	Indicator 2 of Table #3 of Annex I	Delegated Regulation (EU) 2020/1816, Annex II	92	Yes
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)	Indicator 3 of Table #3 of Annex I		N/A	No

[IRO-2-56]

Relevant information disclosed in the Sustainability Reporting was identified on the basis of the association of identified material impacts, risks and opportunities with the topics, subtopics and sub-subtopics identified by ESRS 1 AR 16. Subsequently, the identified topics, subtopics and sub-subtopics were associated with the relevant Disclosure Requirements from EFRAG Guideline ID 177 - Links Between AR16 and Disclosure Requirements.

[IRO-2-59]

ENVIRONMENTAL INFORMATION

DISCLOSURES PURSUANT TO ART. 8 OF REGULATION 2020/852 (TAXONOMY REGULATION)

Eligibility analysis

The analyses conducted led to the identification of both eligible economic activities carried out directly by the Group and costs incurred during the year pertaining to the purchase of products from economic activities eligible for the taxonomy. The list of eligible activities is thus as follows:

- **1.2 Transition to a circular economy (1.2 CE)** - "Manufacture of electrical and electronic equipment", with reference to capitalised costs for the purchase of new vending machines;
- **5.3 Transition to a circular economy (5.3 CE)** - "Preparation for re-use of end-of-life products and product components", with reference to the activity of overhaul and recovery of used distributors. For this activity, the costs capitalised by S. Italia S.p.A. for carrying out the reclamation operations of used distributors are accounted for but not the relative revenues since they are intragroup and thus eliminated at the consolidated level;
- **6.5 Climate change mitigation (6.5 CCM)** - "Transport by motorbikes, passenger cars and light commercial vehicles", with reference to the operating and investment costs for the car fleet used by the Group to transport products, vending machines and employees;
- **7.2 Climate Change Mitigation (7.2 CCM)** - "Renovation of existing buildings", with reference to renovation works on the buildings of Group companies (including work on rented assets);
- **7.3 Climate Change Mitigation (7.3 CCM)** - "Installation, maintenance and repair of energy efficiency equipment" with reference to efficiency measures on the buildings of Group companies;
- **7.5 Climate change mitigation (7.5 CCM)** - "Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings" with reference to the installation of devices for measuring the energy consumption of the buildings of the Group's companies;
- **7.6 Climate change mitigation (7.6 CCM)** - "Installation, maintenance and repair of renewable energy technologies", with reference to the installation of photovoltaic panels carried out at the Barcelona site and on the Italian branches of IVS Italia and S. Italia;
- **7.7 Climate change mitigation (7.7 CCM)** - "Acquisition and ownership of buildings", with reference to the costs incurred in leasing assets owned by third parties.



Alignment analysis

Substantive contribution criteria

The Regulation provides for different substantive contribution criteria for eligible activities, as shown in the following table:

Activities	Substantive contribution criterion	Group Evaluation
1.2 CE	Investments must comply with a complex set of criteria, defined by the Regulation and aimed at defining the parameters of product durability, design and safety, as well as consumer communication and producer responsibility.	Given the complexity of the criteria to be verified, requiring access to the documentation of the various suppliers and the adoption of a precautionary approach, the Group considers the criterion not met for purchases associated with this activity.
5.3 CE	<ol style="list-style-type: none"> The activity prepares for reuse products or components of products that have become waste so that they can be reused without further pre-processing. The waste raw materials of the business come from waste collected separately and transported in separated fractions or mixed at the source. The business has implemented acceptance, safety and inspection procedures in accordance with defined criteria. The activity uses tools and equipment suitable for preparing discarded end-of-life products for reuse. The activity has a system for reporting the recovery rate and, where appropriate, the targets for preparation for re-use or recycling set by Union or national legislation. The result of the activity is products or components of products suitable for reuse without any other pre-processing and moreover, the goods sold are subject to a contract of sale, where applicable, and comply with the provisions on product conformity, seller's liability, burden of proof, remedies for lack of conformity, how to exercise such remedies, repair or replacement of goods, and commercial guarantees. For the preparation for re-use of Waste Electrical and Electronic Equipment (WEEE), the business is authorised to process the waste and implements an Environmental Management System according to ISO 14001:2015. 	Although the reclamation activities carried out by S. Italia meet some of the substantive contribution criteria laid out, by adopting a conservative approach, the Group does not believe it possesses all the elements to confirm compliance with the entire set of criteria defined by the Regulation.
6.5 CCM	Vehicles in the categories have specific CO ₂ emissions of less than 50 gCO ₂ /km (equal to 0 as of 01/01/2026).	Only the electric vehicles in the fleet meet these parameters
7.2 CCM	Building renovations comply with the applicable requirements for major restorations	It was not possible to verify the criterion for all interventions during the year
7.3 CCM	The activity consists of one of the efficiency measures provided for in the Regulation	Eligible interventions refer to measures included in the list outlined in the Regulation
7.5 CCM	The activity consists of one of the provisions for energy performance measurement provided for in the Regulation	Eligible interventions refer to measures included in the list outlined in the Regulation
7.6 CCM	The activity consists of installation, maintenance and repair of photovoltaic-solar systems and ancillary technical equipment.	The criterion is met for all Group assets
7.7 CCM	The building has at least one Class A energy performance certificate	The assets included in the eligible activity do not have a Class A energy performance certificate



DNSH criteria

The Regulation provides for different DNSH criteria for eligible activities, as shown in the following table:

Activities	DNSH criteria	Group Evaluation
1.2 CE	CCM: If it contains refrigerants, the manufactured product complies with the global warming potential GWP performance set out in Regulation (EU) no. 517/2014. The business does not manufacture products containing sulphur hexafluoride (SF6). If applicable, the manufactured product does not score lower than the third highest energy efficiency class from among those in which a significant percentage of products are placed.	CCM: The purchased vending machines that contain refrigeration units comply with the applicable regulations
	CCA: The physical climatic risks to the business were identified by conducting a robust Climate Risk and Vulnerability Assessment.	CCA: A Climate Risk and Vulnerability Assessment has not been carried out to date.
	WTR: Risks of environmental degradation related to the preservation of water quality and the prevention of water stress are identified and addressed, with the aim of achieving good water status and ecological potential.	WTR: To date, there has been no mapping of the risks of environmental degradation related to water quality preservation.
	PPC: The activity does not involve the manufacture, placing on the market or use of substances listed in Appendix C of the Regulation.	PPC: It was not possible to assess full compliance with the requirements of Appendix C of the Regulation for this reporting year.
5.3 CE	BIO: An Environmental Impact Assessment or Review was carried out in accordance with Directive 2011/92/EU.	BIO: No Environmental Impact Assessment was carried out.
	CCM: If the activity involves on-site heat/cooling generation or co-generation, including electricity generation, the direct Greenhouse Gas emissions of the activity are less than 270 gCO ₂ e/kWh	CCM: The activity does not involve on-site heat/cooling generation or co-generation.
	CCA: The physical climatic risks to the business were identified by conducting a robust Climate Risk and Vulnerability Assessment.	CCA: A Climate Risk and Vulnerability Assessment has not been carried out to date.
	WTR: Risks of environmental degradation related to the preservation of water quality and the prevention of water stress are identified and addressed, with the aim of achieving good water status and ecological potential.	WTR: To date, there has been no mapping of the risks of environmental degradation related to water quality preservation.
6.5 CCM	PPC: The activity does not involve the manufacture, placing on the market or use of substances listed in Appendix C of the Regulation.	PPC: For this reporting year, it was not possible to assess full compliance with the requirements of Appendix C of the Regulation.
	BIO: N/A	BIO: N/A
	CCA: The physical climatic risks to the business were identified by conducting a robust Climate Risk and Vulnerability Assessment.	CCA: A Climate Risk and Vulnerability Assessment has not been carried out to date.
	WTR: N/A	WTR: N/A
6.5 CCM	EC: The vehicles are: a) Reusable or recyclable by at least 85% by weight; and b) Reusable or recoverable by at least 95% by weight. Measures are in place for managing waste in both the utilisation and end-of-life phase of the fleet in accordance with the waste hierarchy.	EC: the Group does not currently have all the information needed to assess compliance with this criterion.
	PPC: The vehicles comply with the requirements of the latest applicable stage of the Euro 6-type approval for light vehicle emissions. The vehicles meet the emission thresholds for clean light-duty vehicles. The tyres meet the requirements for external rolling noise in the highest class and the rolling resistance coefficient in the two highest classes.	PPC: newly-registered Group vehicles meet the parameters and characteristics under consideration.
	BIO: N/A	BIO: N/A
	CCA: The physical climatic risks to the business were identified by conducting a robust Climate Risk and Vulnerability Assessment.	CCA: A Climate Risk and Vulnerability Assessment has not been carried out to date.
7.2 CCM	WTR: The work carried out complies with a series of parameters defined by the Regulations concerning the water consumption of the plumbing appliances installed.	WTR: The criterion is only applicable to part of the interventions carried out but compliance could not be verified.
	EC: The work conducted complies with a set of parameters defined in the Regulation concerning the treatment of waste produced during the supported operations.	EC: It was not possible to verify compliance with the criterion in the context of the interventions carried out during the year.
	PPC: The materials used within the context of the work comply with the criteria for substances mentioned in Appendix C of the Regulation.	PPC: For this reporting year, it was not possible to assess full compliance with the requirements of Appendix C of the Regulation.
	BIO: N/A	BIO: N/A

7.3 CCM	CCA: The physical climatic risks to the business were identified by conducting a robust Climate Risk and Vulnerability Assessment.	CCA: A Climate Risk and Vulnerability Assessment has not been carried out to date.
	WTR: N/A	WTR: N/A
	EC: N/A	EC: N/A
	PPC: The materials used within the scope of the supported interventions comply with the criteria for substances mentioned in Appendix C of the Regulation.	PPC: For this reporting year, it was not possible to assess full compliance with the requirements of Appendix C of the Regulation.
	BIO: N/A	BIO: N/A
7.5 CCM	CCA: The physical climatic risks to the business were identified by conducting a robust Climate Risk and Vulnerability Assessment.	CCA: A Climate Risk and Vulnerability Assessment has not been carried out to date.
	WTR: N/A	WTR: N/A
	EC: N/A	EC: N/A
	PPC: N/A	PPC: N/A
	BIO: N/A	BIO: N/A
7.6 CCM	CCA: The physical climatic risks to the business were identified by conducting a robust Climate Risk and Vulnerability Assessment.	CCA: A Climate Risk and Vulnerability Assessment has not been carried out to date.
	WTR: N/A	WTR: N/A
	EC: N/A	EC: N/A
	PPC: N/A	PPC: N/A
	BIO: N/A	BIO: N/A
7.7 CCM	CCA: The physical climatic risks to the business were identified by conducting a robust Climate Risk and Vulnerability Assessment.	CCA: A Climate Risk and Vulnerability Assessment has not been carried out to date.
	WTR: N/A	WTR: N/A
	EC: N/A	EC: N/A
	PPC: N/A	PPC: N/A
	BIO: N/A	BIO: N/A

Minimum safeguards

Finally, the Group analysed its degree of adherence to the principles referred to in Article 18 of the Regulation, also based on the guidance provided by the Platform on Sustainable Finance³.

With regard to the safeguards in place within the Group, IVS operates and requires its employees, external contractors and business partners to operate in accordance with its Code of Ethics, which defines the ethical and moral principles underpinning the rules of conduct to which the Group's internal and external stakeholders must adhere. The safeguards and controls in place to meet the requirements of Article 18 of the Regulation are, in particular, the following:

- The Code of Ethics, whose principles must be respected by all Group procedures;
- The Organisational, Management and Control Model pursuant to Legislative Decree 231/01, which ensures that the organisation's activities are carried out in full compliance with the Decree and prevents and sanctions any conduct that may fall within one of the offences set out in the Decree;
- The Anti-Corruption Code, which guarantees maximum transparency and fairness in the management of relations with third parties, with particular attention to the Public Administration;
- Procedures for related party transactions, which define and identify related parties and identify the procedures to be adopted whenever transfers of resources, services or obligations occur;
- Privacy-GDPR, to promote a culture of data protection and confidentiality of the information of employees, contractors, customers and suppliers;
- The Whistleblowing Procedure for reporting violations of the Code of Ethics and Model 231/01;
- The Antitrust Code, which illustrates the contents of the law protecting competition and provides practical guidance on how to behave in real-life situations that may lead to potential antitrust violations;
- The Anti-Money Laundering Procedure, to prevent and monitor anomalies in order to report any suspicious money laundering transactions.

In addition, please refer to section GOV-1 for information on diversity in governing bodies. With respect to the gender pay gap issue, it is specified that the Group - even in the absence of formal policies - ensures equal pay for all employees and has recently embarked on a path to obtain voluntary equal opportunity certification.

³ Final Report on Minimum Safeguards, October 2022

With respect to the analysis on the investments incurred, the Group does not consider the current practices in place in the supply chain sufficient to consider the activities identified as eligible as being aligned with the safeguard criteria.

KPI Calculation Methodology - Accounting Policy

The Annexes to the Disclosure Delegated Act (EU) 2021/2178 (hereafter, "Disclosures Delegated Act") require a calculation of the percentage of Turnover, CapEx and OpEx associated with eligible and aligned assets. To meet this regulatory requirement, as indicated in the previous paragraphs, the Group identified its eligible activities and calculated the three KPIs required by the Regulation.

The following paragraphs present in detail the analyses carried out to meet the disclosure requirements of the Disclosure Delegated Act, detailing the methodologies applied and the accounting items considered for the calculation of the three KPIs.

TURNOVER

In line with the Disclosure Delegated Act, the Group considered the following values for the calculation of the Turnover Ratio:

- **Denominator:** net turnover from the provision of services after deduction of sales discounts and value-added taxes directly related to turnover. In order to avoid any possible double counting, intercompany parties have been elided and do not contribute to the determination of the KPI;
- **Numerator:** the portion of net turnover (taken into account for the calculation of the denominator) associated with eligible and aligned activities.

CAPEX

For the calculation of the denominator of the CapEx KPI, the Group considered the additions incurred in the reporting period relative to tangible assets (development and restructuring of corporate assets), intangible assets (patents, software and capitalised research and development costs) and Right of Use (RoU) assets. The approach used for the extraction of the aforementioned figures involved a detailed analysis of management reports showing the investments made during the year by all companies within the scope of consolidation.

In line with the Disclosure Delegated Act, the Group considered the following values for calculating the CapEx rate:

- **Denominator:** In calculating the denominator, the Group considered tangible assets accounted for in accordance with IAS 16, intangible assets (excluding goodwill) accounted for in accordance with IAS 38, and leases accounted for in accordance with IFRS 16;
- **Numerator:** considered for the purpose of determining the numerator were the CapEx related to assets or processes associated with eligible and aligned activities and the purchase of products from taxonomy-eligible economic activities and individual measures that enable the target activities to reduce their emission profile.

OPEX

In line with the Disclosure Delegated Act, the Group considered the following values for calculating the OpEx rate:

- **Denominator:** For the calculation of the denominator, the following were considered:
 - » Non-capitalised R&D costs relating to internal and external projects, from which the cost component relating to managing R&D projects carried out has been eliminated;
 - » Short-term leases, whereby all items in the chart of accounts relating to leases accounted for in the Income Statement were considered, as they relate to contracts with a duration of less than 12 months and thus represent exemptions from accounting under IFRS 16;
 - » Costs related to maintenance and repairs, with costs related to employees involved in maintenance and repair activities and also maintenance commissioned to third-party companies being taken into account for this category, whilst within the accounts for maintenance and repairs, renovations to buildings that can be assimilated to the concept of building renovation measures mentioned in the Disclosure Delegated Act were also considered.

The result of these analyses determined a value to be considered non-material in relation to total operating expenses (2.8 million euros).

Financial Year 2024		Year	Criteria for substantial contribution										DNSH criteria ("do no significant harm")															
Economic activities			Code	Turnover MLN€	Share of Turnover, year 2024	Yes/No	N/A/M	CCM	Yes/No	N/A/M	CCA	Yes/No	WTR	N/A/M	Yes/No	CE	Yes/No	PPC	Yes/No	BIO	Yes/No	MS	Share of turnover aligned with (A.1.) or admissible (A.2.) to the taxonomy, year 2023	A Qualifying activity category	T Qualifying activity category			
A. ACTIVITIES ELIGIBLE FOR TAXONOMY																												
A.1 Environmentally-sustainable activities (aligned with taxonomy)																												
Turnover of environmentally-sustainable activities (aligned to taxonomy) (A.1)			-	0	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	-	-			
of which enabling			-	0	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	-	-			
of which transitional			-	0	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	-	-			
A.2 Activities eligible for taxonomy but not environmentally-sustainable (activities not aligned with the taxonomy)																												
Turnover from activities eligible for the taxonomy but not environmentally-sustainable (activities not aligned with the taxonomy) (A.2)			-	0	0%																					0%		
A. Turnover of activities eligible for taxonomy (A.1+A.2)			-	0	0%																					0%		
B. ACTIVITIES NOT ELIGIBLE FOR TAXONOMY																												
Turnover of activities not eligible for taxonomy			-	732.8	100%																							
Total (A+B)			-	732.8	100%																							

Financial Year 2024		Year	Criteria for substantial contribution										DNSH criteria ("do no significant harm")														
Economic activities			Code	CAPEX	Share of CapEx, year 2024	%	Yes/No	N/AM	CCM	Yes/No	N/AM	CCA	Yes/No	WTR	N/AM	CE	Yes/No	N/AM	PCC	Yes/No	BIO	Yes/No	MS	Share of CapEx aligned (A.1.) or taxonomy, year 2023	A	Qualifying activity category	T
A. ACTIVITIES ELIGIBLE FOR TAXONOMY																											
A.1 Environmentally-sustainable activities (aligned with taxonomy)																											
CapEx of environmentally-sustainable activities (aligned to taxonomy) (A.1)			-	0	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	-	-	0%	-	-	-
of which enabling			-	0	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	-	-	0%	-	-	-
of which transitional			-	0	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	-	-	0%	-	-	-
A.2 Activities eligible for taxonomy but not environmentally-sustainable (activities not aligned with the taxonomy)																											
Preparation for re-use of end-of-life products and product components			CE 5.3	19.84	15.2%	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL			22.6%			
Manufacture of electrical and electronic equipment			CE 1.2	34.66	26.6%	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL			34.7%			
Transport by motorbikes, passenger cars and light commercial vehicles			CCM 6.5	12.37	9.5%	EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL			13.7%			
Renovation of existing buildings			CCM 7.2	0.55	0.4%	EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL			1.2%			
Installation, maintenance and repair of energy efficiency equipment			CCM 7.3	0.29	0.2%	EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL			0.4%			
Installation, maintenance and repair of instruments and devices for measuring, regulating and controlling the energy performance of buildings			CCM 7.5	0.01	0.0%	EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL			0.0%			
Installation, maintenance and repair of renewable energy technologies			CCM 7.6	0.30	0.2%	EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL			0.7%			
Acquisition and ownership of buildings			CCM 7.7	52.57	40.3%	EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL			9.5%			
CapEx of activities eligible for the taxonomy but not environmentally-sustainable (activities not aligned with the taxonomy) (A.2)				120.59	92.42%	50.7%	-	-	-	42.2%	-	-	-	42.2%	-	-	-	-	-	-	-			82.8%			
A. CapEx of activities eligible for taxonomy (A.1+A.2)				120.59	92.42%	50.7%	-	-	-	42.2%	-	-	-	42.2%	-	-	-	-	-	-	-			82.8%			
B. ACTIVITIES NOT ELIGIBLE FOR TAXONOMY																											
CapEx of activities not eligible for taxonomy				9.89	7.6%																						
Total (A+B)				130.48	100%																						

Objective	Share of turnover/total turnover		Share of CapEx/Total CapEx	
	Aligned by objective	Eligible by objective	Aligned by objective	Eligible by objective
CCM	0%	0%	0%	50.7%
CCA	0%	0%	0%	0%
WTR	0%	0%	0%	0%
CE	0%	0%	0%	42.2%
PPC	0%	0%	0%	0%
BIO	0%	0%	0%	0%

Model 1 - Nuclear and Fossil Gas Activities

Line	Activities related to nuclear energy	
1.	The company carries out, finances or has exposures to research, development, demonstration and implementation of innovative power generation plants that produce energy from nuclear processes with a minimum amount of fuel-cycle waste.	No
2.	The company carries out, finances or has exposure to the construction and safe operation of new nuclear power plants for the generation of electricity or process heat, including for district heating purposes or for industrial processes such as hydrogen production, along with improvements to their safety with the help of the best available technology.	No
3.	The company carries out, finances or has exposure to the safe operation of existing nuclear power plants that generate electricity or process heat, including for district heating or industrial processes such as the production of hydrogen from nuclear energy, along with improvements to their safety.	No
Fossil gas activities		
4.	The company carries out, finances or has exposure to the construction or operation of power generation plants using gaseous fossil fuels.	No
5.	The company carries out, finances or has exposure to the construction, upgrading and operation of combined heat/cool and power generation plants using gaseous fossil fuels.	No
6.	The company carries out, finances or has exposure to the construction, upgrading and operation of heat generation plants producing heat/cooling using gaseous fossil fuels.	No

ESRS E1 CLIMATE CHANGE

Governance

Disclosure requirement related to ESRS 2 GOV-3 Integration of sustainability-related performance in incentive schemes

To date, climate considerations are not taken into account when determining the remuneration of members of the administrative, management and supervisory bodies. As a result, members' performance is not assessed in relation to specific climate targets. [\[ESRS 2 GOV-2. 13\]](#)

Strategy

E-1 Transition plan

To date, the Group has no climate change mitigation transition plan in place and has no plan to adopt one in the next year. [\[E-1-14,17\]](#)

ESRS 2 SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model

For the list of impacts, risks and opportunities related to climate change, including all stages of the value chain and all risks, physical and transitional, found relevant by the Double Materiality Analysis, please refer to section SBM-3. [\[E-1-18\]](#)

As part of its business strategy, the Group has not yet defined a specific plan for climate change resilience analysis. [\[E1-19\]](#)

Impact, Risk and Opportunity Management

ESRS 2 IRO-1 - Description of the processes to identify and assess material climate-related impacts, risks and opportunities

The analysis of climate change-related IROs was included in the double relevance process, which examined the significant impacts the company has on the environment, as well as the financially-relevant risks and opportunities. For details on the process of identifying and assessing impacts, risks and opportunities, please refer to section **ESRS 2 IRO-1**. Climate-relevant risks are listed in **ESRS E1-1-18**. [\[E1-1-20.a,b,c\]](#)

Currently, the Group has not employed climate scenario analyses to assess climate change risks. [\[E1-1-21\]](#)

E1-2 - Policies related to climate change mitigation and adaptation

The Group adopted an Integrated Policy, which came into force in January 2023, valid for the entire Group. Its implementation is monitored by the office responsible for the integrated system, reporting to the Managing Directors. In relation to environmental aspects, the Policy is certified according to UNI EN ISO 14001:2015 for Environmental Management and UNI CEI EN ISO 50001:2018 on Energy Efficiency. At present, a process of integrating the interests of key stakeholders within the Integrated Policy has not been formalised. The Policy is published on the Group's website and is thus accessible to all stakeholders. To date, the Group has no specific policy for managing climate change issues nor defined actions or targets to address climate impacts. [\[E1-2-22,23,24,25\]](#)

The implementation of this Policy is under the direct responsibility of the directors, managers, and employees of the IVS Group, as well as all individuals who, directly or indirectly, on a permanent or temporary basis, establish a relationship with the Group.

The absence of a specific policy for these issues stems from the fact that the IVS Group adopts an integrated policy, which includes environmental aspects but lacks detailed objectives and actions in this regard. [\[ESRS 2-62\]](#)

E1-3 - Actions and resources in relation to climate change policies

The IVS Group is constantly striving to improve the environmental performance of its business operations by implementing a number of initiatives aimed at reducing its impact on climate change, including:

- Use of new gases with reduced impact on Greenhouse Emissions (R290);
- The purchase of vending machines with advanced technical features and special energy-saving functions to optimise energy consumption;
- The replacement and purchase of new generation vehicles with low environmental impact, contributing to the reduction of CO₂ emissions;
- The installation of photovoltaic systems to produce renewable energy, reducing dependence on fossil fuels;
- Rationalising purchasing by organising bulk orders with the aim of reducing the transport of goods and, consequently, logistics-related emissions

Through these initiatives, the IVS Group is committed to steadily consolidating its contribution to the fight against climate change. However, these actions are not specifically included in the Group Policy and do not refer to climate change mitigation and adaptation objectives, as the latter is integrated in nature and does not detail the individual measures adopted. [\[E1-3-26,27,28,29; ESRS 2-62\]](#)

Metrics and Targets

E1-4 - Targets related to climate change mitigation and adaptation

At present, the Group has not set specific targets for the management of climate change issues, as for this first year of reporting on the entire perimeter of GHG emissions (including Scope 3) the focus of the Group was set on the calculation of the baseline. [\[E1-4-30\]](#)

E1-5 - Energy consumption and mix

[\[E1-5-37-a,b,c\]](#)

	2024
(1) Fuel consumption from coal and coal products (MWh)	0.00
(2) Fuel consumption from crude oil and petroleum products (MWh)	71,139.95
(3) Fuel consumption from natural gas (MWh)	4,790.44
(4) Fuel consumption from other fossil sources (MWh)	0.00
(5) Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources (MWh)	11,649.43
(6) Total fossil energy consumption (MWh)	87,579.82
Share of fossil sources in total energy consumption (%)	98.55%
(7) Consumption from nuclear sources (MWh)	356.10
Share of consumption from nuclear sources in total energy consumption (%)	0.40%
(8) Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.) (MWh)	216.19
(9) Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	0.00
(10) The consumption of self-generated non-fuel renewable energy (MWh)	714.83
(11) Total renewable energy consumption (MWh) (calculated as the sum of lines 8 to 10)	931.02
Share of renewable sources in total energy consumption (%)	1.05%
Total energy consumption (MWh) (calculated as the sum of lines 6, 7 and 11)	88,866.94

For the calculation of energy consumption, the billed consumption of each Group company was reported. Where invoice data could not be retrieved, consumption was estimated on the basis of disbursements made during the reporting year. For the calculation of energy from nuclear sources, the percentages reported by suppliers in their invoices were adopted. Otherwise, if the figure was not available, the national energy mix was adopted.

[\[E1-5 MDR-M 77.a\]](#)



E1-6 - Gross Scopes 1, 2, 3 and Total GHG emissions

[E1-6-44-a,b,c,d; E1-6-48,49,50,51,52; E1-6-AR.40,41,44,45,46,47,48]

	Milestones and target years				Annual % target/ Base year
	2024	2025	2030	2050	
Scope 1 GHG emissions					
Gross Scope 1 GHG emissions (tCO ₂ eq)	19,948.02	-	-	-	-
Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)	0.00%	-	-	-	-
Scope 2 GHG emissions					
Gross location-based ⁽¹⁾ Scope 2 GHG emissions (tCO ₂ eq)	3,128.96	-	-	-	-
Gross market-based Scope 2 GHG emissions (tCO ₂ eq)	5,702.15	-	-	-	-
Significant scope 3 GHG emissions					
Total Gross indirect (Scope 3) GHG emissions (tCO ₂ eq)	308,885.42	-	-	-	-
1. Purchased goods and services	168,348.47	-	-	-	-
2. Capital goods	11,698.66	-	-	-	-
3. Fuel and energy-related Activities (not included in Scope1 or Scope 2)	5,334.34	-	-	-	-
4. Upstream transportation and distribution	12,705.65	-	-	-	-
5. Waste generated in operations	218.18	-	-	-	-
6. Business traveling	820.35	-	-	-	-
7. Employee commuting	1,808.30	-	-	-	-
8. Upstream leased assets	N/A	-	-	-	-
9. Downstream transportation	7,870.43	-	-	-	-
10. Processing of sold products	N/A	-	-	-	-
11. Use of sold products	99,678.42	-	-	-	-
12. End-of-life treatment of sold products	402.62	-	-	-	-
13. Downstream leased assets	N/A	-	-	-	-
14. Franchises	N/A	-	-	-	-
15. Investments	N/A	-	-	-	-
Total GHG emissions					
Total GHG emissions (location-based) (tCO ₂ eq)	331,962.40	-	-	-	-
Total GHG emissions (market-based) (tCO ₂ eq)	334,535.59	-	-	-	-

⁽¹⁾ Location based scope 2 emissions are calculated based on the contractual instruments in force with the Companies' suppliers that currently do not foresee any PPA nor GO.

Utilised for the calculation of emissions were the emission factors published by DEFRA 2024, which can be found at the link: <https://www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2024>. Emissions were calculated on the basis of energy consumption multiplied by the respective conversion factors. [E1-6-AR.39.b]

Categories 8, 10, 13, 14 and 15 were excluded from the GHG inventory calculation due to not being representative for any of the Group companies. [E1-6-AR.46.i] See [BP-2-10.a-b-c-d] in which the calculation methodology for every Scope 3 category is reported. [E1-6-AR.46.g]

Energy intensity	2024		
	Energy consumption	Net revenue	Energy intensity
Units of Measurement	MWh	EUR (thousand)	MWh/EUR (thousand)
Total Energy Consumption deriving from activities in high climate impact sectors (MWh)/Net revenue from activities in high climate impact sectors (gas distribution and water service activities - EUR (thousand))	88,866.94	732,777	0.12

The related GHG emissions intensity equals to 0.450 tCO₂e / EUR (thousands) considering location based GHG emissions (0.454 tCO₂e / EUR (thousands) considering market based approach). [E1-6-53,54 AR.53]

The net revenues used to calculate the emission intensity correspond to the total revenues reported in the Management Report, within the Group Performance section. [E1-6-55, E1-6 AR.55]

ESRS E2 POLLUTION

Impact, Risk and Opportunity Management

ESRS 2 IRO-1 - Description of the processes to identify and assess material pollution-related impacts, risks and opportunities

The analysis of pollution-related IROs was integrated into the double relevance process, which assessed the significant impacts the company generates in terms of pollution, along with the financially-relevant risks and opportunities. For more details on the process of identifying and assessing impacts, risks and opportunities, please see **ESRS 2 IRO-1**. [\[E2 ESRS 2 IRO-1\]](#)

The material result impact on pollutant emissions was as follows: “Air pollution due to logistics” in the Group's direct operations.

E2-1 - Policies related to pollution

The Group adopted an Integrated Policy, which came into force in January 2023, valid for the entire Group. Its implementation is monitored by the office responsible for the integrated system, reporting to the Managing Directors. In relation to environmental aspects, the Policy is certified per the UNI EN ISO 14001:2015 standard for environmental management. At present, a process of integrating the interests of key stakeholders within the Integrated Policy has not been formalised. The Policy is published on the Group's website and is thus accessible to all stakeholders. [\[E2-1-12\]](#)

With regard to the emission of pollutants, the Policy does not set out specific actions to mitigate significant impacts related to air pollution. To date, the Group does not have a dedicated policy for managing pollution-related environmental issues nor defined actions or targets to address their impacts. [\[E2-1-14,15.a\]](#)

The absence of a specific policy for these issues stems from the fact that the IVS Group adopts an integrated policy, which includes environmental aspects but lacks specific objectives and actions on the subject of pollutants. [\[ESRS 2-62\]](#)

E2-2 - Actions and resources related to pollution

The absence of specific actions for these issues stems from the fact that the IVS Group adopts an integrated policy, which includes environmental aspects but lacks specific objectives and actions. [\[E2-2-16; ESRS 2-62\]](#)

Metrics and Targets

E2-3 - Targets related to pollution

Currently, the Group has not set specific targets for pollutant management. [\[E2-3-20\]](#)

E2-4 - Pollution of air, water and soil

The emissions of pollutants from the IVS Group's direct operations are shown in the table below and refer to the pollutants generated by the Group's fleet of vehicles utilised for logistics activities. [\[E2-4 AR.21\]](#)

E2-4-28	UoM	2024
CO (Carbon monoxide)	Tonnes	40.59
NO _x (Nitrogen oxides)	Tonnes	7.76
PM (Particulate Mass)	Tonnes	0.42

In relation to the reported data, there are no significant changes during the year 2024. [\[E2-4-30.a\]](#)

The reported amounts of pollutant emissions were estimated on the basis of the average kilometres driven and on the basis of the environmental class of each vehicle in the company fleet, considering the respective pollutant limits. . The contribution of each vehicle is thus been estimated based on a conservative approach, since it is based on the hypothesis that each vehicle has emitted an amount equal to the maximum reported for each environmental class. This methodology used has been applied due to the lack of available primary data. No specific standards nor sectorial studies have been used in addition to the described approach. This measurement of the metric is not validated by an external body. [\[E2-4-30.b\]](#)

The Group's monitoring of emissions and pollutants was not conducted according to the EU BREF Standards. To date, the Automated Measuring Systems (AMS) have not been subject to calibration tests. [\[E2-4 AR.27\]](#) Regarding financial effects, no operating and capital expenditures incurred in 2024 in conjunction with major incidents and deposits related to pollution. [\[E2-4-40b\]](#)

ESRS E3 WATER AND MARINE RESOURCES

Impact, Risk and Opportunity Management

ESRS 2 IRO-1 - Description of the processes to identify and assess material water and marine resources-related impacts, risks and opportunities

The analysis of IROs related to water and marine resources was integrated into the Double Materiality Assessment, which examined the significant impacts generated by the company in relation to water resources, as well as relevant risks and opportunities from a financial perspective.

The material result impact with respect to water resource issues is the "Contribution of suppliers to water scarcity", in the upstream stages of the value chain. For materiality purposes, a list of geographical areas where water is a significant issue in the upstream stages of the value chain was considered: Central and southern Italy and the Italian islands, San Marino, southern Spain, western France, western Poland and central and southern Portugal.

[\[E3 ESRS 2 IRO-1 AR.15.a\]](#) For more details on the process of identifying and assessing impacts, risks and opportunities, please see **ESRS 2 IRO-1**. [\[E3 ESRS 2 IRO-1-8.a\]](#)

At present, no formal consultations have been undertaken with the communities concerned. [\[E3 ESRS 2 IRO-1-8.b\]](#)

E3-1 - Policies related to water and marine resources

The Group adopted an Integrated Policy, which came into force in January 2023, valid for the entire Group. Its implementation is monitored by the office responsible for the integrated system, reporting to the Managing Directors. At present, a process of integrating the interests of key stakeholders within the Integrated Policy has not been formalised. The Policy is published on the Group's website and is thus accessible to all stakeholders.

With regard to water resources, the Group uses water for both sanitary and industrial purposes, mainly for cleaning and sanitising vending machines. However, to date, there is no specific policy dedicated to managing such issues nor have targeted objectives and actions been defined to address the associated risks and impacts. [\[E3-1-9,10,11\]](#)

E3-2 - Actions and resources related to water and marine resources

The absence of specific actions on these issues stems from the fact that the IVS Group adopts an integrated policy, which includes environmental aspects but lacks specific objectives and actions on water. [\[E3-2-15\]](#)

Metrics and Targets

E3-3 - Targets related to water and marine resource

At present, the Group has not set specific targets for water management. [\[E3-3-20\]](#)

E3-4 - Water consumption

At present, no quantitative data on water consumption is reported, as the material impacts reported in IRO-1 refer to activities along the value chain and not to the Group's direct operations. [\[E3-4-26\]](#)

ESRS E5 RESOURCE USE AND CIRCULAR ECONOMY

Impact, Risk and Opportunity Management

ESRS 2 IRO-1 - Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities

The analysis of IROs related to the circular economy was integrated into the Double Materiality Assessment, which examined the significant impacts generated by the company in relation to these issues, as well as the relevant risks and opportunities from a financial perspective.

- The material result impacts with respect to circular economy issues are: "Contribution to raw material scarcity due to the production activity of suppliers" in the upstream stages of the value chain;
- "Generation of non-recyclable waste from product packaging", in the downstream stages of the value chain.

For more details on the process of identifying and assessing impacts, risks and opportunities, please see **ESRS 2 IRO-1**. [\[E5 ESRS 2 IRO-1-11.a\]](#)

At present, no formal consultations have been undertaken with the communities concerned.

[\[E5 ESRS 2 IRO-1-11.b\]](#)

E5-1 - Policies related to resource use and circular economy

The Group adopted an Integrated Policy, which came into force in January 2023, valid for the entire Group. Its implementation is monitored by the office responsible for the integrated system, reporting to the Managing Directors. At present, a process of integrating the interests of key stakeholders within the Integrated Policy has not been formalised. The Policy is published on the Group's website and is thus accessible to all stakeholders.

As far as the circular economy is concerned, the Group is constantly striving to promote sustainable recycling practices. However, to date, there is no specific policy dedicated to managing such issues nor have targeted objectives and actions been defined to address the associated risks and impacts. [\[E5-1-12\]](#)

E5-2 - Actions and resources related to resource use and circular economy

The Group is unwaveringly committed to promoting a circular economy, focusing its efforts mainly on the sustainable management of the packaging of the products it distributes, including those of Coca-Cola HBC Italia. In particular, the Group has initiated a number of strategic partnerships that positively impact circularity, helping to reduce the use of virgin plastic and improve the lifecycle of materials.

One of the main actions concerns the sourcing of products in 100% recycled plastic, a choice shared with Coca-Cola HBC Italia for its rPET bottles for soft drinks such as Coca-Cola, Fanta, Sprite, Kinley, FuzeTea and Powerade and with San Benedetto S.p.A. for its EcoPET bottles, as well as with FLO S.p.A. for its Hybrid glasses. Through these partnerships, the IVS Group supports the distribution of these products, contributing to a reduction in the use of new plastic. [\[E5-2 MDR-A 68.a,b\]](#) For this action, no timeframe has been defined within which the initiative is expected to conclude due to the very nature of the collaboration established with the suppliers. [\[E5-2 MDR-A 68.c\]](#)

In addition, the IVS Group is actively collaborating with Coca-Cola HBC Italy in promoting Tethered Caps, a measure that simplifies collection and recycling whilst reducing plastic leakage into the environment. This initiative, introduced in advance of the European Directive on single-use plastics, has been progressively extended to all products in the Coca-Cola portfolio distributed by the Group, reinforcing the common commitment to sustainability and circularity. [\[E5-2 MDR-A 68.a,b\]](#) For this action, no timeframe has been defined within which the initiative is expected to conclude due to the very nature of the collaboration established with the supplier. [\[E5-2 MDR-A 68.c\]](#)

The IVS Group is likewise working to improve its systems for collecting and disposing of waste from distributed products, working with partners to ensure that packaging is properly collected, recycled and reused, thus completing the life-cycle of materials and reducing the overall environmental impact.

With Brita S.p.A., a supplier of water filter cartridges for vending machines, the Group is committed to recycling 100% of the plastic material of the filter composition. [\[E5-2 MDR-A 68.a,b\]](#) This initiative is continuous in time. [\[E5-2 MDR-A 68.c\]](#)

The Group purchases 100% recycled material for the production of the bags used for the delivery of OCS machine products.

In Italy, a portion of the waste coffee grounds is collected to then be transformed, in collaboration with Organica S.r.l., to generate electricity. In France, rather, the same by-product is given to a company that transforms it into

combustible material. [\[E5-2 MDR-A 68.a,b\]](#) Although the Group has not set a target, it intends to increasingly extend these initiatives in order to reuse an increasing percentage of coffee waste. [\[E5-2 MDR-A 68.c\]](#)

A further initiative promoted by the Group's Italian companies consists in delivering packaged products, no longer usable in our sales circuit, to the Banco Alimentare (Food Bank) chain for consumption by those in need.

[\[E5-2 MDR-A 68.a,b\]](#) The Group's intention is to increase this initiative from year to year, although there is no time horizon defining the actual timeframe and objectives. [\[E5-2 MDR-A 68.c\]](#)

From the Lavazza Group, the Group purchases products linked to projects that promote fair-trade raw materials and that improve and support farming communities in non-European countries. [\[E5-2 MDR-A 68.a,b\]](#) For this action, no timeframe has been defined within which the initiative is expected to conclude due to the very nature of the collaboration established with the supplier. [\[E5-2 MDR-A 68.c\]](#)

The initiatives described above are not foreseen within a policy dedicated to circularity matters due to the fact that the IVS Group adopts an integrated policy, which includes environmental aspects but lacks specific objectives and actions on circular economy issues. [\[E5-2-17\]](#)

The IVS Group pays utmost attention to the recovery of assets, materials, and components, particularly concerning our vending machines. These can follow three channels:

- **The refurbishment channel:** allows to recover obsolete models of vending machines and their spare parts.
- **The scrapping channel:** allows to recover about 80% of the raw materials they are composed.
- **The resale channel**

Metrics and Targets

E5-3 - Targets related to resource use and circular economy

At present, the Group has not defined specific targets on circular economy issues. [\[E5-3-21\]](#)

E5-4 - Resource inflows

At present, no quantitative information on incoming resources is reported, as the material impacts reported in IRO-1 refer to activities along the value chain and not to the Group's direct operations. [\[E5-4-28\]](#)

E5-5 - Resource outflows

Currently, no quantitative information on outgoing resources is reported, as the material impacts cited in IRO-1 refer to activities along the value chain and not to the Group's direct operations. [\[E5-5-33\]](#)

Waste

	Tonnes	%
Total waste generated [E5-5-37.a]	7,563.15	-
of which total amount and percentage of non-recycled waste [E5-5-37.d]	1,480.03	19.57%
	Hazardous waste	Non-hazardous waste
Diverted from disposal [E5-5-37.b]	744.02	5,339.10
Preparation for reuse (Hazardous waste+ Non-hazardous waste)		617.98
Recycling (Hazardous waste+ Non-hazardous waste)		5,368.90
Other recovery operations (Hazardous waste+ Non-hazardous waste)		96.24
Directed to disposal [E5-5-37.c]	139.78	1,340.26
Incineration (Hazardous waste+ Non-hazardous waste)		623.10
Landfill (Hazardous waste+ Non-hazardous waste)		602.76
Other disposal operations (Hazardous waste+ Non-hazardous waste)		254.18

[\[E5-5-38\]](#)

The waste consists mainly of material related to warehouse and office operations (such as plastic packaging, paper and cardboard or mixed packaging). The waste data include both the quantities collected by third-party suppliers and the portion of waste collected by the relevant municipalities. The latter is estimated based on the parameter of waste generated (collected by third parties) per service provided, calculated as the average of the Group's main locations.

SOCIAL INFORMATION

ESRS S1 OWN WORKFORCE

Strategy

ESRS 2 SBM-2 - Interests and views of stakeholders

The IVS Group adopts a structured approach to ensure the highest standards of health and safety for its own workforce. This commitment is reflected in the constant application of local legislative requirements, promoting ongoing dialogue with its employees to ensure that all company facilities and outsourced processes operate in complete safety.

The IVS Group likewise commits to respecting and protecting human rights, ensuring that the work performed by its employees is always voluntary and never coerced through threats or penalties. Employment relationships are based on maximum clarity and transparency. In this context, the company fosters a work environment that respects the dignity and fundamental rights of each individual, ensuring equal opportunities and fair working conditions for all.

The management of these issues is formalised in the integrated Policy, which outlines the guidelines followed by all companies in the Group. The document is made available through the company's intranet portal and institutional websites, providing all interested parties - including customers and suppliers - with clear indications on the optimal behaviours to adopt, with a particular focus on preventive actions and the goal of continuous improvement. [\[S1 ESRS 2 SBM-2-12\]](#)

ESRS 2 SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model

The IVS Group recognises that the actual and potential impacts, risks and opportunities on its employees, as outlined below, are closely connected to its strategy and business model. [\[S1 ESRS 2 SBM-3-13.a,b\]](#)

Negative impacts:

Impact on the health and safety of workers and collaborators.

The presence of elements of potential risk can lead to occupational accidents, especially related to transport and maintenance activities. [\[S1 ESRS 2 SBM-3-14.b\]](#)

Types of workers involved: salaried employees and self-employed professionals. [\[S1 ESRS 2 SBM-3-14.a\]](#)

Positive impacts:

Employee skill development.

Positive impact related to the contribution to the professional development and training of employees through the Group's training programmes.

[\[S1 ESRS 2 SBM-3-14.c\]](#)

Types of workers involved: Salaried employees.

[\[S1 ESRS 2 SBM-3-14.a\]](#)

Risks:

Risk of business interruptions due to workplace accidents.

Any disruptions to operations as a result of potential accidents involving collaborators and employees may negatively impact both the Group's reputation and its revenues. [\[S1 ESRS 2 SBM-3-14.d\]](#)

Opportunities:

Opportunities for the development of skills and technical know-how within the management team.

Economic opportunity related to the development of human capital, professional profiles, and training of IVS' collaborators, which can lead to an overall improvement in the quality of work and, consequently, the company's overall economic performance. [\[S1 ESRS 2 SBM-3-14.d\]](#)

Currently, there are no material impacts on workforce arising from the implementation of a transition plan.

[\[S1 ESRS 2 SBM-3-14.e\]](#)

The Group does not engage in operations at significant risk of incidents related to forced labour or child labour.

[\[S1 ESRS 2 SBM-3-14.f,g\]](#)

The Group has not yet gained an understanding of how individuals with specific characteristics, those working in certain contexts or otherwise engaged in particular activities may be more vulnerable to harm.

[\[S1 ESRS 2 SBM-3-15\]](#)

Impact, Risk and Opportunity Management

S1-1 - Policies related to own workforce

The IVS Group has implemented workforce policies and procedures, such as corporate internal rules and National Collective Labour Agreement (NCLAs) applicable to all employees, including full-time, part-time, temporary and contract workers, in compliance with Italian labour law (Law 300/1970 - Statuto dei Lavoratori, Legislative Decree 81/2008 on workplace safety and Legislative Decree 231/2001 on corporate liability). These policies and procedures ensure fair treatment, non-discrimination and safe working conditions. [\[S1-1-17\]](#)

The Company Internal Regulations establish the fundamental rules and guidelines that govern the working environment, ensuring compliance with legal requirements, organisational efficiency and a positive workplace culture. These regulations apply to all employees and (where applicable) to external collaborators and consultants operating within the company.

Below are the main elements: Code of Conduct and Ethical Standards (defining the expected professional behaviour, ethical principles and company values that employees must uphold in all work-related activities), Workplace Policies and Procedures (covering attendance, working hours, remote work arrangements and general operational guidelines to ensure consistency and efficiency), Health, Safety, and Workplace Security (establishing rules and preventive measures to ensure a safe and healthy workplace, in compliance with national safety regulations), Use of Company Resources and IT Policies (regulating the appropriate use of company assets, including IT systems, email, internet access and confidential information protection), Disciplinary Measures and Compliance (outlining the procedures and consequences for non-compliance with company policies, ensuring fairness and adherence to labour laws), Training and Professional Development (encouraging continuous learning and career growth through mandatory and voluntary training programs), the Human Resources (HR) Department and the Company Management are responsible for the effective implementation, monitoring and enforcement of these policies. [\[S1-1-19, S1-1 MDR-P.65.a,b,c\]](#)

In line with the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, along with the OECD Guidelines for Multinational Enterprises and Italian legislation, the company commits to:

- Respecting human and labour rights, in accordance with Article 36 of the Italian Constitution, ensuring fair remuneration and working conditions;
- Employee engagement, promoting participation through trade unions and worker councils as per Law 300/1970;
- Access to remedy, providing grievance mechanisms in compliance with Legislative Decree 231/2001, which establishes internal reporting channels for ethical violations. [\[S1-1-20.a\]](#)

The company's Code of Ethics and Organisational Model (ex Legislative Decree 231/2001) is aligned with internationally-recognised human rights instruments. Compliance is monitored through internal audits and external certifications, such as SA8000 (Social Accountability) and ISO 45001 (Occupational Health and Safety).

The company has implemented a Workplace Health and Safety Management System (SGSL), in line with Legislative Decree 81/2008 and ISO 45001, to prevent workplace accidents. Key measures include:

- Risk assessments and periodic safety audits in accordance with the Prevention and Protection Service Manager (RSPP) requirements.
- Mandatory training programmes for employees and managers, as required by Article 37 of Legislative Decree 81/2008.
- Incident reporting and corrective action plans, monitored by the Supervisory Board (SB) under Legislative Decree 231/2001. [\[S1-1-23\]](#).

The above-mentioned policies have been introduced in the Group prior to the definition of material impacts under the Double Materiality Assessment, and therefore do not cover all the relevant impacts, risks and opportunities detected.

S1-2 - Processes for engaging with own Workforce and Workers' Representatives about impacts

The IVS Group ensures that the perspectives of its workforce inform decisions and activities affecting employees. Engagement occurs:

- Directly with employees through periodic surveys, internal communication platforms and focus groups. All these activities are centrally managed by the corporate offices, which provide support to all areas and departments;
- Through Workers' Representatives, in compliance with Law 300/1970 (Workers' Statute) and Legislative Decree 81/2008 (Workplace Safety Law), ensuring collective bargaining and consultation with trade unions (RSU/RSA). [\[S1-2-27.a\]](#)

The feedback received will be integrated into the decision-making process through focus groups using a bottom-up approach, ensuring that employee insights actively contribute to shaping company policies and initiatives. Once analysed, key takeaways and resulting decisions will be communicated to the workforce through internal communication channels, such as newsletters, dedicated meetings and/or digital platforms, ensuring transparency on how their input has influenced company decisions. [\[S1-2 AR.24.b\]](#) These activities are carried out through funded training programmes and by allocating the hourly cost of employees dedicated to this function (Training & Development). [\[S1-2 AR.24.d\]](#)

Engagement occurs at various stages, including:

- Crisis response (ad-hoc meetings, such as during the COVID-19 pandemic);
- Workplace health and safety audits (semi-annual consultations). [\[S1-2-27.b\]](#)

The following functions ensure workforce engagement:

- HR Director, responsible for overall workforce relations;
- Representative of Workers' Safety Representatives (RLS), overseeing Occupational Health and Safety compliance;
- Supervisory Board (SB) under Legislative Decree 231/2001, ensuring legal and ethical compliance. [\[S1-2-27.c\]](#)
- Respect for freedom of association and collective bargaining (Article 39 of the Italian Constitution [\[S1-2-27.d\]](#)

Effectiveness is assessed through:

- Employee Satisfaction Surveys measuring engagement and wellbeing;
- Whistleblower Reports and Grievance Mechanism Outcomes, monitored in compliance with Legislative Decree 24/2023 (Whistleblowing Protection Law). [\[S1-2-27.e\]](#)

S1-3 - Processes to remediate negative impacts and channels for own workers to raise concerns

IVS Group is committed to providing or contributing to remedy mechanisms whereby it has caused or contributed to material negative impacts on its workforce. The company follows the principles of proportionality and effectiveness, as outlined in:

- Leg. Decree 231/2001 (Corporate Administrative Liability Law) - ensuring internal accountability structures;
- Law 300/1970 (Workers' Statute) - guaranteeing employee rights and fair treatment.

The effectiveness of remedy mechanisms is assessed through:

- Employee satisfaction surveys on dispute resolution outcomes;
- Internal audits evaluating policy implementation;
- Independent monitoring by the Supervisory Board (SB) under Legislative Decree 231/2001. [\[S1-3-30\]](#)

The Group utilises a structured **remediation process** to address issues and ensure continuous improvement. This process includes:

- Employee satisfaction surveys on dispute resolution outcomes - gathering direct feedback from employees to assess the effectiveness and fairness of dispute resolution mechanisms;
- Internal audits evaluating policy implementation - conducting regular audits to monitor compliance, identify gaps and implement corrective actions where necessary;
- Independent monitoring by the Supervisory Board (SB) under Legislative Decree 231/2001 - ensuring oversight and adherence to ethical and legal standards through independent supervision and reporting mechanisms. [\[S1-3-32.a\]](#)

The company has multiple formal and confidential channels for employees to raise concerns, including:

- Internal Whistleblowing system, compliant with Legislative Decree 24/2023 (Whistleblower Protection Law), allowing for anonymous reporting;
- Employee grievance procedures, aligned with ISO 45001 (Occupational Health and Safety Management), enabling workplace safety concerns to be reported;
- Direct engagement with HR and trade unions, in accordance with collective bargaining agreements (CCNL - Contratto Collettivo Nazionale di Lavoro). [\[S1-3-32.b\]](#)

The IVS Group has a formalised grievance mechanism that:

- Ensures compliance with legal frameworks, including Legislative Decree 81/2008 (Workplace Safety Law) and Law 300/1970. [\[S1-3-32.c\]](#)

To ensure accessibility and effectiveness, the company:

- Integrates technology-driven reporting platforms, allowing for easy and anonymous submission of concerns;
- Works closely with RSU/RSA (workers' representatives) to promote awareness of grievance channels. [\[S1-3-32.d\]](#)

The company tracks and monitors all workforce-related concerns through:

- Quarterly reports to the Board and Supervisory Board (SB) on labour rights and ethical compliance;
- Feedback loops with employees and trade unions, ensuring a continuous improvement of grievance mechanisms. [\[S1-3-32.e\]](#)

IVS Group ensures employees are aware of and trust these processes through:

- Whistleblower protection policies, aligned with Legislative Decree 24/2023, ensuring no retaliation against workers or representatives who report concerns. [\[S1-3-33\]](#)

S1-4 - Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own work-force, as well as the effectiveness of those actions

In line with Italian labour laws (Law 300/1970 - Statuto dei Lavoratori), Legislative Decree 81/2008 - Workplace Safety and Legislative Decree 231/2001 - Corporate Compliance), the IVS Group has implemented the following actions:

Key actions: [\[S1-4 MDR-A 68.a\]](#)

- **Workplace Health and Safety Programmes:** Regular risk assessments and training, in accordance with Legislative Decree 81/2008, to prevent work-related injuries and illnesses. Scope: This training programme is aimed at all employees of the Group's companies in Italy. [\[S1-4 MDR-A 68.b\]](#)
Time horizon: Group companies in Italy comply with the provisions of the same Legislative Decree 81/2008. [\[S1-4 MDR-A 68.c\]](#)
- **Fair Compensation and Working Hours:** Adherence to CCNL (National Collective Bargaining Agreement) or equivalent to prevent wage exploitation and excessive working hours. [\[S1-4-35,38.a\]](#)
Scope: For all Group company employees. [\[S1-4 MDR-A 68.b\]](#)
Time horizon: No time limit is defined since adherence to the National Collective Bargaining Agreements is continuous [\[S1-4 MDR-A 68.c\]](#)

Below are listed the future actions planned by the Group.

Workplace Health and Safety Programmes

- **Planned Actions:** Strengthening regular risk assessments and expanding safety training initiatives to further mitigate work-related injuries and illnesses; **Scope:** Group-wide implementation, ensuring consistent application across all units; **Timeframe:** By the end of 2025, with periodic reviews to enhance effectiveness.

Fair Compensation and Working Hours

- **Planned Actions:** Enhancing monitoring mechanisms to ensure full compliance with CCNL (Collective Bargaining Agreement) provisions, preventing wage exploitation and regulating working hours effectively; **Scope:** Implementation across all business units, with a specific focus on areas requiring improvement; **Timeframe:** Progressive implementation through 2025, with a verification of full compliance by mid-2026.

These initiatives aim to create a safer, fairer and more sustainable work environment, aligning with the Group's long-term commitment to employee well-being and regulatory compliance.

[\[S1-4 MDR-A 68.a,b,c\]](#)

Where material workforce-related issues arise, the company ensures effective remedy through:

- Internal grievance mechanisms in line with Legislative Decree 24/2023 (Whistleblower Protection Law);
- Corrective action plans following workplace incidents, aligned with Legislative Decree 81/2008;
- Independent mediation with trade unions to resolve disputes fairly and transparently. [\[S1-4-35,38.b\]](#)

Beyond legal compliance, IVS Group invests in:

- Employee Well-Being Programmes, including work-life balance policies;
- Professional Development and Training, with funding for upskilling through inter-professional training funds (Fondi Interprofessionali);
- Flexible Work Arrangements, including smart working policies compliant with Law 81/2017. [\[S1-4-35,38.c\]](#)

The company identifies necessary actions through:

- Annual workforce risk assessments, conducted in compliance with Legislative Decree 81/2008 and ISO 45001;
- Regular engagement with employee representatives (RSU or Unitary Trade Union Representative/RSA or Company Union Representative) to anticipate emerging labour issues. [\[S1-4-39\]](#)

To reduce risks related to workforce management, the company has implemented:

- Data protection policies, ensuring ethical employee data use in compliance with GDPR (EU Regulation 2016/679);
- Supply Chain Audits, ensuring ethical labour practices among suppliers in compliance with Legislative Decree 231/2001. [\[S1-4-40.a\]](#)

Data Protection Policies: The Group ensures ethical use of employee data by adhering to GDPR (EU Regulation 2016/679). This is embedded within the broader Risk Management framework, with regular assessments to mitigate any risks to data protection. The effectiveness of this action is verified during periodically-scheduled training activities involving all Group Company employees [\[S1-4-40.a\]](#)

Supply Chain Audits: Ethical labour practices among suppliers are monitored through regular audits to ensure compliance with Legislative Decree 231/2001. These audits are integrated into the Group's Risk Management system, addressing potential risks in the supply chain. This approach ensures continuous oversight of labour practices and enables the monitoring of the effectiveness of corrective actions over time. [\[S1-4-40.a\]](#) By incorporating these elements into the Risk Management structure, the Group ensures a comprehensive and proactive approach to workforce-related risks and legal compliance. [\[S1-4 AR.47\]](#)

Data Protection Policies

- **Planned Actions:** Further enhancing employee data protection by implementing advanced data encryption, regular privacy audits and strengthening employee training on GDPR compliance; **Scope:** Group-wide application, ensuring consistency across all subsidiaries and departments; **Timeframe:** By the end of 2025, with ongoing monitoring and periodic updates to align with evolving privacy regulations.

Supply Chain Audits

- Planned Actions: Expanding the scope of supply chain audits to include deeper checks on ethical labour practices and establishing a more robust Supplier Code Of Conduct to ensure full compliance with Legislative Decree 231/2001;
Scope: Applicable across the entire supply chain, with a particular focus on high-risk suppliers and regions;
Timeframe: By mid-2025, with a continuous evaluation and improvements to audit processes.

These future actions aim to enhance the Group's ethical standards, ensuring both data protection and supply chain compliance are continuously improved and aligned with legal requirements.
[S1-4-40.b]

To ensure that business operations do not contribute to workforce harm, the company:

- Audits procurement practices to ensure fair labour conditions throughout the supply chain. [S1-4-41]

For information on tracking effectiveness through targets, please refer to Section S1-5 - Targets for Managing Workforce-Related Impacts, Risks and Opportunities. [S1-4-38.d;42]

- Annual investment in workforce training, wellbeing, and compliance programmes;
- External advisory partnerships, including legal and compliance consultants for labour law adherence. [S1-4-43]

Metrics and Targets

S1-5 - Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities
Below the key workforce-related targets are reported

Target Area	Description	Target Value	Timeline [S1-4 MDR-T 80.e]	Baseline [S1-4 MDR-T 80.d]	Legal Framework	Scope [S1-4 MDR-T 80.c]
Workplace Safety	Reduce workplace accidents	-20% incidents	2028	2024	Leg. Decree 81/2008,	Italian Companies
					ISO 45001	for 13 Group Companies
Skills Development	Provide professional training to employees	90% workforce participation	2026	2024	Interprofessional Training Funds	Italian Companies
Work-Life Balance	Increase remote work flexibility	100% eligible workforce with smart working options	2025	2024	Law 81/2017 (Smart Working Law)	Italian Companies

We have chosen these criteria based on key strategic assumptions. The company aims to become more managerial, shifting its focus beyond purely technical training to also include soft-skill development. This approach is essential to fostering leadership, communication and adaptability within the workforce.

Additionally, flexibility is a crucial factor in remaining competitive in the labour market, rendering the company more attractive to candidates and contributing to a lower turnover rate. By investing in these areas, we ensure long-term sustainability and a stronger, more resilient organisation. [S1-4 MDR-T 80.f]

Stakeholders have not been engaged in the target-setting process. [S1-4 MDR-T 80.h]

The progress toward the targets has been closely monitored, showing positive trends in key areas. The shift towards a more managerial approach has led to an increase in soft-skill training initiatives, enhancing leadership and employee engagement.

At the same time, the focus on flexibility has contributed to rendering the company more attractive to talent, with initial signs of improved retention rates and reduced turnover. While some areas still require further improvement, the overall trend indicates that the chosen strategy is yielding concrete and measurable benefits. [\[S1-4 MDR-T 80.j\]](#)

The IVS Group follows a structured process when defining workforce-related targets:

The company actively involves employees and workers' representatives in setting targets through:

- Bilateral discussions with trade unions in compliance with the National Collective Bargaining Contract (RSA or Rappresentanza Sindacale Aziendale in Italy, CGT or Confédération Générale du Travail in France and CGT or Confederación General del Trabajo in Spain;
- Employee surveys and focus groups to identify workforce needs and expectations;
- Consultation with the Supervisory Board (SB) under Legislative Decree 231/2001 to ensure compliance and ethical standards in Italy, the Commission Nationale de l'Informatique et des Libertés (CNIL) for data protection supervision in France, Agencia Española de Protección de Datos (AEPD) for data protection and privacy oversight in Spain. Although France and Spain do not have a Supervisory Board with the same characteristics as in Italy, IVS in these countries implement compliance programmes with figures such as the Compliance Officer, ethics committees and internal control systems to prevent wrongdoing.

To measure progress, the company employs:

- Annual workforce reports, publicly disclosed as part of the company's Sustainability Report;
- Third-party audits (such as ISO 45001 certification for safety and SA8000 for social responsibility).

Through structured target-setting, performance tracking and continuous improvement, the IVS Group ensures a transparent, compliant and effective workforce management strategy, aligned with both Italian labour laws and ESG standards. [\[S1-4-47.a,b,c\]](#) [\[S1-5-49.a,b,c\]](#)

S1-6 - Characteristics of the undertaking's employees

Below the metrics related to the company's employees as of December 31, 2024 are reported.

Table 1 - Template for presenting information on employee head count by gender [\[S1-6-50.a; AR.55;69\]](#)

Gender	Number of employees (head count)
Male	3,953
Female	652
Other	0
Not reported	0
Total Employees	4,605

The breakdowns by gender and by country for countries in which the undertaking has 50 or more employees representing at least 10% of its total number of employees refer to Italy and Spain, as France, the third most represented country is below that threshold.

Table 2 Template for presenting employee head count in countries where the undertaking has at least 50 employees representing at least 10% of its total number of employees.

Country	Number of employees (head count)
Italy	3,479
Spain	568

Table 3 - Template for presenting information on employees by contract type, broken down by gender (head count). There are no significant differences in the definition, among the countries the Group operates, of the categories in the table below [\[S1-6-50.b\]](#)

	2024				
	FEMALE	MALE	OTHER	NOT DISCLOSED	TOTAL
Number of employees (head count)	652	3,953	0	0	4,605
Number of permanent employees (head count)	614	3,691	0	0	4,305
Number of temporary employees (head count)	38	262	0	0	300
Number of non-guaranteed hours employees (head count)	0	0	0	0	0
Number of full-time employees (head count)	472	3,897	0	0	4,369
Number of part-time employees (head count)	180	56	0	0	236

No assumptions were made with respect to the above data. [\[S1-6-50.d\]](#)

	2024
[S1-6-50.c]	
Total number of employees who have left the undertaking	626
Employee turnover rate	16.00%

Please note that the figure on table above also include an estimate for those employees not included within the HR portal currently in use. For those employees, the turnover has been estimated based on the actual data available (that cover 26.5% of the headcount) [\[S1-6-50.d\]](#)

Please note that the total number of IVS Group employees is shown in the "Employees" section of the Management Report and in "Note 33 - Personnel costs" of the Notes to the Financial Statements as at 31.12.2024. [\[S1-6-50.f\]](#) The measurement of these metrics was not validated by an external body.

S1-7 - Characteristics of non-employees in the undertaking's own workforce

As provided for in ESRS 1-10.4 the Group omits the datapoints of the DR S1-7 for this first year reporting.

S1-11 - Social protection

As provided for in ESRS 1-10.4 the Group omits the datapoints of the DR S1-11 for this first year reporting.

S1-12 - Percentage of employees with disabilities

As provided for in ESRS 1-10.4 the Group omits the datapoints of the DR S1-12 for this first year reporting.

S1-13 - Training and skills development

As provided for in ESRS 1-10.4 the Group omits the datapoints of the DR S1-13 for this first year reporting.

S1-14 - Health and safety metrics

The management system is structured and implemented in compliance with the requirements of relevant international standards. The regulatory tools in place contribute to ensuring legal compliance and safeguarding the health and safety of the Group's people (employees, end customers, contractors, etc.), as well as preventing accidents.

13 companies within the Group are ISO 45001-certified for Occupational Health and Safety Management (79.32% of the total workforce).

100% of the Group's employees, regardless of their contract type, are covered by Occupational Health and Safety Management Systems.

As provided for in ESRS 1-10.4 the Group omits the datapoints on cases of work-related ill-health and on number of days lost to injuries, accidents, fatalities and work-related ill health as well as information on non-employees for this first year reporting. [\[S1-14-88.a, AR.80, AR.89, AR.91\]](#)

S1-15 - Work-life balance

As provided for in ESRS 1-10.4 the Group omits the datapoints of the DR S1-15 for this first year reporting.

S1-17 - Incidents, complaints and severe human rights impacts

[S1-17-103]	Unit of Measure	2024
(a) The total number of incidents of discrimination, including harassment, reported in the reporting period;	number	0
(b) The number of complaints filed through channels for people in the undertaking's own workforce to raise concerns (including grievance mechanisms) and, where applicable, to the National Contact Points for OECD Multinational Enterprises related to the matters defined in Paragraph 2 of this Standard, excluding those already reported in (a) above;	number	0
(c) The total amount of fines, penalties and compensation for damages as a result of the incidents and complaints disclosed above, along with a reconciliation of such monetary amounts disclosed with the most relevant amount presented in the Financial Statements;	number	-

[\[S1-17-103.a,b,c\]](#)

This measurement of the metric is not validated by an external body other than the assurance provider. As for the methodologies used and significant assumptions behind the metric, the data have been determined by the incident reported to the competent bodies in the Group.

The IVS Group did not experience any cases of severe incidents concerning human rights in 2024. Please refer to the information in section G1 for the description of the processes in place in case severe incidents would occur. [\[S1-17-104.a,b\]](#)



ESRS S2 WORKERS IN THE VALUE CHAIN

Strategy

ESRS 2 SBM-2 Interests and views of stakeholders

The IVS Group integrates respect for the rights and opinions of workers along the entire value chain into its strategy and business model through employee surveys, focus groups and internal communication platforms. At the same time, suppliers are required to adopt environmental standards equivalent to those applied within its own organisations. [\[S2 SBM-2-9\]](#)

ESRS 2 SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model

The IVS Group acknowledges that the actual and potential impacts on workers along the value chain, as described below, are closely linked to its strategy and business model: [\[S2 SBM-3-10.a\]](#)

Negative impacts:

Violation of human or labour rights in the supply chain.

Potential negative impact on workers involved along the supply chain: the suppliers' work activities may be characterised by exposure to the risk of accidents and incidents of human or labour rights violations. This impact is widespread, potentially leading to recurring human rights issues across various operations. [\[S2 SBM-3-11.c\]](#)

Types of value chain workers affected by this impact: Salaried employees and self-employed professionals and in general workers working for entities in the value chain (upstream and downstream) [\[S2 SBM-3-11.a.ii,iii\]](#)

Impact, Risk and Opportunity Management

S2-1 - Policies related to value chain workers

In compliance with Italian labour laws (Legislative Decree 231/2001 - Corporate Compliance, Legislative Decree 81/2008 - Workplace Safety and Legislative Decree 24/2023 - Whistleblower Protection) The IVS Group has implemented procedures to manage material impacts, risks and opportunities related to value chain workers. The Company Internal Regulations establish the fundamental rules and guidelines that govern the working environment, ensuring compliance with legal requirements, organisational efficiency and a positive workplace culture. These procedures and regulations apply to all employees and (where applicable) to external collaborators and consultants operating within the company. [\[S-2-1-14\]](#)

IVS Group ensures that its procedures apply to:

- All direct suppliers and subcontractors in Italy and internationally.
- Specific high-risk worker groups, including those in manufacturing, logistics, and agriculture, where labour rights risks are higher.

The Human Resources (HR) Department and Company Management are responsible for the effective implementation, monitoring and enforcement of these procedures. [\[S-2-1-16, MDR-P 65.b,c\]](#)

These procedures have not yet been specifically aligned with the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, or the OECD Guidelines for Multinational Enterprises. [\[S-2-1-19\]](#)

- Adherence to fair labour conditions, ensuring compliance with the National Collective Bargaining Agreement (CCNL);
- Occupational Health and Safety measures aligned with Legislative Decree 81/2008 (Occupational Safety Consolidation Act);
- Prevention of wage exploitation and precarious work, ensuring minimum wages align with Italian law (Legislative Decree 66/2003 on working hours and minimum wage regulations).
- Strengthening due diligence on subcontracting chains, ensuring full traceability of labour sources. [\[S-2-1-17, MDR-P 65.a\]](#)
- Collaboration with trade unions and worker representatives to assess working conditions and address grievances;
- Grievance mechanisms for value chain workers, allowing them to report issues through:
Anonymous whistleblowing channels, as required by Legislative Decree 24/2023. [\[S-2-1-17.b\]](#)
- Immediate corrective action plans for violations, with contract termination clauses for non-compliant suppliers. [\[S-2-1-17.c\]](#)

The procedures mentioned do not specifically address human trafficking, forced labour or child labour.

- Strict verification of worker documentation, ensuring all employees have legal working status (Legislative Decree 286/1998 - Immigration Law). [\[S-2-1-18\]](#)

To date, the IVS Group does not have a Supplier Code of Conduct.

The annual sustainability report includes disclosures on any violations and the corrective actions taken.

Through structured procedures, engagement mechanisms and compliance tracking, the IVS Group ensures the protection of value chain workers' rights, aligned with Italian law and international labour standards.

Currently there are no dedicated policies related to workers in the value chain besides the above-mentioned procedures in place.

S2-2 - Processes for engaging with value chain workers about impacts

Currently, the Group has not yet implemented a process to engage with value chain workers. [\[S-2-2-22-24\]](#)

S2-3 - Processes to remediate negative impacts and channels for value chain workers to raise concerns

Currently, the Group has not established a channel for raising concerns, nor does it support the availability of such a channel in the workplaces of value chain workers.

S2-4 - Taking action on material impacts on value chain workers as well as approaches to managing material risks and pursuing material opportunities related to value chain workers plus the effectiveness of those actions

As of now, the Group has not yet taken any action regarding the material impacts on value chain workers.

[\[S2 ESRS 2-62\]](#)

Metrics and Targets

S2-5 - Targets related to managing material negative impacts, advancing positive impacts and managing material risks and opportunities

As of now, the Group has not yet set any targets for managing material negative impacts and risks to value chain workers. [\[S2 ESRs 2-81\]](#)

ESRS S4 CONSUMERS AND END-USERS

Strategy

ESRS 2 SBM-2 - Interests and views of stakeholders

The IVS Group integrates respect for the rights and opinions of its consumers and end-users into its strategy and business model, guaranteeing a 7-day-a-week customer service to respond to any customer and/or supplier needs. In addition, the Group offers direct support through a dedicated chat service on its websites, ensuring constant and attentive dialogue with all stakeholders, in particular consumers and end-users, in order to respect their human rights and guide their strategic choices. [\[S-4 SBM-2-8\]](#)

ESRS 2 SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model

The IVS Group acknowledges that the actual and potential impacts on consumers and end-users, as described below, are closely linked to its strategy and business model:

Negative impacts:

Damage to consumer health

The company's activities can lead to possible damage to consumers' health if dietarily unhealthy or poorly-preserved food is distributed. In particular, such impact can also be caused by the use of non-compliant water for the dispensing of hot and cold beverages. The impact is considered widespread because, although it affects a large number of consumers, it stems from isolated situations, such as poorly-preserved food or the use of non-compliant water, without reflecting a systemic problem within the company. [\[S4 ESRs2 SBM-3-10.b\]](#)

Types of consumers impacted: Consumers or end-users of products harmful to health. [\[S4 ESRs2 SBM-3-10.a\]](#)

Risks:

Reputational risks and legal sanctions in the event of consumer harm

In the event of damage to public health related to distributed food and beverages, the company may incur legal sanctions. Moreover, this would entail a reputational risk.

The Group has not yet gained an understanding of how consumers and/or end-users with specific characteristics, or those who use certain products or services, may be more exposed to risks. [\[S4 ESRs2 SBM-3-11\]](#)

Impact, Risk and Opportunity Management

S4-1 - Policies related to consumers and end-users

The IVS Group has long implemented and maintained procedures to manage potential emergency situations and incidents that may impact on food safety and which are relevant to the organisation's role in the food supply chain.

The company periodically evaluates and maintains the Food Safety System to ensure that it incorporates the latest information on Food Safety hazards kept under control.

Furthermore, through the supply chain and within the organisation itself, the company communicates information concerning the development, implementation and updating of the Food Safety Management System relating to the safety aspects of the products used.

All activities implemented by the IVS Group's Vending Companies have been set up in compliance with internationally-recognised regulations (RE852/2004) and in accordance with the SDG principles, in particular for fighting poverty and achieving better food security for all.

This guarantees and controls through computerised systems that end consumers are guaranteed conformity of purchased products.

To date, these practices are not formalised within a dedicated policy.

S4-2 - Processes for engaging with consumers and end-users about impacts

The IVS Group has adopted procedures and built processes to ensure that traceability of non-compliant products to end consumers is always guaranteed in accordance with internationally-recognised regulatory provisions (RE178/2001). As a direct communication tool, the Group has set up a certified email address to allow everyone to send in reports on possible non-compliant products.

To date, business decisions are positively influenced by the needs and opinions of end consumers, even though there is no engagement with end consumers. [\[S4-2-20\]](#)

S4-3 - Processes to remediate negative impacts and channels for consumers and end-users to raise concerns

The IVS Group avails of customer service/support to guarantee immediate assistance to millions of consumers.

The service guarantees answers, solutions and possible opportunities when facing a problem in order to protect and respect consumers.

S4-4 - Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions

To date, with respect to the negative impacts and risks indicated in Paragraph SBM-3 of 4, the Group operates as indicated below to protect all end-users:

- **Damage to consumer health - Risk of change in consumer eating habits - Reputational risks and legal sanctions in the event of damage to consumer health**

The food sold is in no way detrimental to the health of the end consumer (verification of expiry dates, verification of integrity, verification of potential contamination of external origin). This is achieved thanks to the computerised system used and the systematic control of the equipment by the restockers. These actions are systematically carried out throughout the supply and control chain. The action is continuous over time.

Metrics and Targets

S4-5 - Targets related to managing material negative impacts, advancing positive impacts and managing material risks and opportunities

To date, the Group has not yet defined specific targets with regard to material impacts, risks and opportunities on end consumers.

GOVERNANCE INFORMATION

ESRS G1 BUSINESS CONDUCT

Governance

ESRS 2 GOV-1 - The role of the administrative, supervisory and management bodies [\[G1 GOV-1-5.a,b\]](#)

IVS GROUP SPA is a holding company under Luxembourg law, resident in Italy for tax purposes.

The Company adopts a governance model based on the active role of the Board of Directors, composed of 7 members, 4 of whom are executive and 3 non-executive and independent.

The Company then has an Internal Control Committee, composed of two (2) independent persons - external to the Board of Directors - and a non-executive director.

The Company's Statutory and Consolidated Financial Statements are audited by the Independent Auditors, in accordance with Luxembourg law.

There are no plans to appoint a body equivalent to the Board of Statutory Auditors.

The Company does not have a Board of Statutory Auditors but has set up an Audit Committee to which the Company has decided to assign the tasks listed in the Italian Stock Exchange Code, along with the additional task of monitoring the independence of the Statutory Auditor and contributing to the Statutory Auditor selection process, as required by the Luxembourg law of 23rd July 2016 on Statutory Auditors transposing EU Directive 56/2014 and EU Regulation 537/2014. The Audit Committee consists of two (2) independent members - external to the Board of Directors - and one non-executive director.

The Internal Control and Audit Committee has a consultative function and presents proposals to the Board of Directors, and in particular:

- Defines the guidelines of the internal control system so that the main risks concerning the company and its subsidiaries are correctly identified, as well as assessed, managed and monitored, along with establishing the criteria for determining where such risks are compatible with the proper management of the company;
- Identifies an Executive Director (usually one of the Directors with delegated powers) to supervise the operation of the internal control system;
- Assesses on an annual basis the adequacy, effectiveness and functioning of the internal control system.

In addition, the Internal Control and Audit Committee:

- Monitors the processing of financial information;
- Assesses, jointly with the administrative and accounting function in charge of drawing up the accounting documents, together with the Auditors, the correct application of the accounting principles and their uniformity for the purpose of preparing the Consolidated Financial Statements and other accounting documents, whilst more generally supervising the process of legal auditing of the Company's annual documents and Consolidated Financial Statements;
- Formulates proposals for the Board of Directors;
- At the request of the executive director designated for this purpose, expresses opinions on specific aspects of the process for identifying specific business risks as well as on risks relating to the design, implementation and management of the internal control system;

- Assesses the proposals made by the auditors for the audit work, the work plan drafted for the audit and the results presented in the report and management letter, in addition to making proposals to the Board of Directors;
- Is responsible for the entire auditor selection process, for verifying and monitoring the independence of the auditors, also in relation to the provision of ancillary services to the Company. The proposal for the appointment of the statutory auditor must be based on the directions provided by the Audit Committee;
- Monitors the effectiveness of the audit process, the management of risks pursuant to Legislative Decree 231/2001 on the administrative liability of entities and financial reporting to the market;
- Reports to the Board of Directors on the activities carried out, on the adequacy, effectiveness and actual functioning of the internal control system when approving the annual and half-yearly Financial Reports, and on the results of the Statutory Audit;
- Where necessary, provides a preliminary opinion to the Board of Directors on the approval of certain transactions between the Company and related parties.

The Audit Committee has powers and functions equivalent to those established by the Luxembourg Law of 23rd July 2016 for the Audit Committee.

Furthermore, the Audit Committee reports to the Board of Directors twice a year, on the occasion of the approval of the annual and half-yearly Financial Report, on its activities and on the adequacy of the Internal Control and Risk Management System. In the performance of its duties, the Committee has the power to access all information and corporate functions necessary for executing its duties.

The Company's organisation complies with the regulations and provisions of Luxembourg law applicable to companies, whilst its corporate governance practices comply with the aforementioned legislation, the Articles of Association and, on a voluntary basis where possible, with Borsa Italiana's Corporate Governance Code for Listed Companies.

The Group has defined the document "Procedures for Transactions with Related Parties", aimed at defining and identifying related parties and identifying the procedures to be adopted whenever there are transfers of resources, services or bonds, with or without the stipulation of a fee, from IVS Group or its subsidiaries to parties belonging to this category.

Impact, Risk and Opportunity Management

ESRS 2 IRO-1 - Description of the processes to identify and assess material impacts, risks and opportunities [G1 IRO-1-6]

The analysis of IROs related to business conduct was included in the double relevance process, which examined significant impacts as well as financially-relevant risks and opportunities. For details on the process of identifying and assessing impacts, risks and opportunities, please refer to section **ESRS 2 IRO-1**.

G1-1 - Business conduct policies and corporate culture

The IVS Group has a whistleblowing procedure in place to monitor and address any breaches of IVS's integrity or violations of national or European Union regulations related to business conduct. As mentioned previously, the Group adopted an Integrated Policy, which came into force in January 2023, valid for the entire Group. Its implementation is monitored by the office responsible for the integrated system, reporting to the Managing Directors. The document is made available through the company's intranet portal and institutional websites, ensuring accessibility to all interested parties, with a particular focus on preventive actions and the goal of continuous improvement. The implementation of this Policy is under the direct responsibility of the directors, managers, and employees of the IVS Group, as well as all individuals who, directly or indirectly, on a permanent or temporary basis, establish a relationship with the Group.

In line with these efforts, and as part of its broader commitment to ethical conduct, the Group adheres to the UNI ISO 37001:2016 standard for Anti-Corruption. This includes conducting business with integrity, transparency, and fairness across all countries where the Group operates. The Group implements necessary procedures to ensure compliance with the Anti-Corruption Policy, the Code of Ethics, and applicable Anti-Corruption Laws, while continuously reviewing and monitoring its Anti-Corruption System. Corruption in any form is strictly prohibited, both involving public officials and private individuals, across all jurisdictions. Additionally, all transactions are carefully and accurately recorded, in compliance with accounting principles, to ensure transparency and the traceability of all receipts, payments, and transactions. [\[MDR-P 65.a,b,c\]](#)

The above-mentioned policies have been introduced in the Group prior to the definition of material impacts under the Double Materiality Assessment, and therefore do not cover all the relevant impacts, risks and opportunities detected.

The IVS Group, complying with the Legislative Decree 24/2023, transposing into Italian law Directive (EU) 2019/1937 of 23rd October 2019, on the protection of persons who report breaches of Union law, implemented a reporting system accessible to both internal employees and external stakeholders, such as suppliers and customers.

The selected system, named Etichpoint, is provided by a qualified third party. This certified system is independent of the corporate network and built in compliance with the current legislation (Decree no. 24 of 10th March 2023 transposing European Directive 2019/1937, Legislative Decree 231 of 2001, Law 179 of 2017, European Personal Data Regulation 679/2016 - GDPR) as well as with the company's Code of Ethics and is certified according to the ISO 37002 standard.

A web page on the EthicPoint.eu website (technology infrastructure) dedicated to the service and customised for the IVS Group has been activated. The page includes a form that allows, among other things, separate reporting for each Group company. In addition, an email address (@ethicpoint.eu) has been set up for operating the service, along with a telephone number for verbal reports, both for Italy and abroad. Reports can be made either on a named or anonymous basis. In addition, a physical mailbox (PO Box) was activated and managed independently (with specific forwarding and control procedures). There is even the possibility of meeting with the recipient.

[\[G1-1-10.a; G1-3-18.a,b\]](#)

The body in charge of receiving and analysing reports is the Ethics Committee, composed of two external professionals, acting in accordance with the principles of confidentiality, timeliness of investigation and action, objectivity and impartiality, carrying out any activity deemed appropriate.

If the report is relevant for the purposes of Legislative Decree no. 231/2001, constituting a breach of the Organisational Model or the Code of Ethics or one of the offences set out in the Decree, the Supervisory Board of the company concerned shall be informed.

The IVS Group ensures the confidentiality of the identity of the Whistleblower and the confidentiality of the information contained in the report throughout the case management process and by all parties involved, to the extent that applicable local legislation protects anonymity and confidentiality.

Failure to comply with confidentiality obligations, on the part of any persons involved in the handling of reports, may result in disciplinary liability for the perpetrator, without prejudice to any further liability established by law. The entire reporting process is regulated through a special procedure that defines each aspect.

The IVS Group undertakes to protect the Whistleblower against any retaliatory act as a consequence of the report. The Group considers the processes in place as efficient measures to contrast corruption and bribery, even though they were not defined based on the United Nations Convention against Corruption. For the time being, there are no plan to further integrate the processes with the above mentioned Convention. [\[G1-1-10.b\]](#)

In compliance with the principles of confidentiality and protection of the Whistleblower, the Ethics Committee reports to the Board of Directors on any reports received. [\[G1-1-10.c.i,ii\]](#)

To date, with the issuance of the Code of Ethics and the Group Vision, the Group communicates to all employees and contractors the principles of conduct and corporate culture. [\[G1-1-7,9\]](#)

To strengthen the culture of compliance, an in-person training course was organised for all managers and all sales and area managers. The Group plans to expand training activities, extending training on the Anti-Bribery Model to the entire corporate population. [\[G1-1-10.g\]](#)

To date, the Group investigates incidents of business conduct through the Whistleblowing channel. [\[G1-1-10.e\]](#)
The IVS Group has identified the Area, Branch and Commercial functions as those most involved and exposed to corruption risk. [\[G1-1-10.h\]](#)

G1-3 - Prevention and detection of corruption and bribery

In carrying out its activities, the IVS Group is actively committed to combating corruption and mitigating the risks arising from unlawful conduct, at all levels of work and in all geographical contexts.

In order to strengthen measures to prevent and combat corruption, the IVS Group Board of Directors approved the Anti-Corruption Model, which has been adopted by all Group companies. Furthermore, IVS Group decided to further strengthen its anti-corruption system by complying with the international standard ISO 37001:2016 on Anti-Corruption Management Systems, issued by the International Organisation for Standardisation on 15th October 2016.

The Anti-Corruption Model is inspired not only by compliance with Legislative Decree 231/01 but also with the regulations in force in the countries in which the Group operates, including the ratification provisions of international conventions, such as: the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (1997); the United Nations Convention against Corruption (2003); the Council of Europe Convention on Corruption (1999). [\[G1-1-10.c.ii; G1-3-18.a\]](#)

The Model additionally responds to the tenth principle of the Global Compact, to which IVS adheres, according to which, "Businesses should work against corruption in all its forms, including extortion and bribery."

The Model applies to all members of Boards of Directors and Boards of Statutory Auditors (or administrative and control bodies), employees, contractors of any kind for the IVS Group and Group companies, as well as all those who have contractual relations, whether onerous or gratuitous, with the IVS Group or Group companies.

The Anti-Bribery Model defines general principles and specific guidelines for managing relationships at risk of corruption, identifying standards of conduct and action.

Such has been communicated to the entire corporate population and is accessible through the website of all Group companies. [\[G1-3-20\]](#)

Coinciding with the approval of the Anti-Bribery Policy and Anti-Bribery Model, the Board of Directors appointed an Anti-Bribery Compliance Function, known as the Anti-Bribery Officer, to the Ethics Committee. This person is responsible for implementing and monitoring the Anti-Bribery Model within the Group, ensuring compliance with the requirements of the UNI ISO 37001:2016 standard.

Monitoring the application of the Model is entrusted to the Anti-Bribery Officer who, through audits conducted by the Integrated System and Internal Audit Office, verifies adherence to the established provisions. Managers of the Group companies and branches are in charge of supervising the local implementation of the Anti-Bribery System, reporting any critical issues and suggestions for improvement to the Anti-Bribery Officer.

In addition, to strengthen the culture of compliance, an in-person training course was organised for all managers and all sales and area managers. The Group plans to expand training activities, extending training on the Anti-Bribery Model to the entire corporate population. [\[G1-3-21.a,b,c\]](#)
[\[G1-3 AR.8\]](#)

	At-risk functions ⁽¹⁾	Managers ⁽²⁾	AMSB ⁽³⁾	Other own workers
Training coverage				
Total	1,227	15	10	-
Total receiving training	97	6	1	-
Topics covered				
Definition of corruption	X	X	X	-
Policy	X	X	X	-
Procedures on suspicion/detection	X	X	X	-
Integrated Compliance Etc.	X	X	X	-

⁽¹⁾ At-risk functions include, on a conservative basis, all employees of the Group, excluding blue collars.

⁽²⁾ Managers include exclusively employees that are classified as "executive" according to Italian Labor Law ("Dirigenti")

⁽³⁾ AMSB includes the members of the Board of Directors and of the Supervisory Board

No further actions are currently planned in relation to the above reported IROs.

Metrics and Targets

G1-4 - Incidents of corruption or bribery

Throughout 2024, there were no cases of corruption. [\[G1-4-24.a,b\]](#)

